

Colorado Department of Public Health and Environment

OPERATING PERMIT

Grand River Gathering – Hunter Mesa Compressor Station

Issued: September 1, 2009

AIR POLLUTION CONTROL DIVISION COLORADO OPERATING PERMIT

FACILITY NAME: Hunter Mesa OPERATING PERMIT NUMBER

Compressor Station

FACILITY ID: 0452222

ISSUED: September 1, 2009 EXPIRATION DATE: September 1, 2014

MODIFICATIONS: See Appendix F of Permit

Issued in accordance with the provisions of Colorado Air Pollution Prevention and Control Act, 25-7-101 et

seq. and applicable rules and regulations.

ISSUED TO: PLANT SITE LOCATION:

Grand River Gathering, LLC

2128 Railroad Avenue, Suite 106 SESE of Section 1, T7S, R93W

Rifle, CO 81650 Garfield County

INFORMATION RELIED UPON

Operating Permit Renewal Application Received: November 17, 2003

And Additional Information Received: August 26, 2004, November 23, 2004

June 8, 2005, September 1, 2005, October 28, 2005 April 14, 2007, February 15, April 7, 28 & 29, 2008; March 12, 2009; March 27, 2009; April 2 & 13, 2009, February 10, 2011, September 6, 2011, and September

12OPGA363

19, 2011

Nature of Business: Compression & Natural Gas Liquids Extraction

Primary SIC: 1311

RESPONSIBLE OFFICIALS FACILITY CONTACT PERSON

Name: Mike Rose Name: Mike Rose

Title: Director of Engineering and Title: Director of Engineering and Operations

Operations

Phone: (214) 242-1964 Phone: (214) 242-1964

SUBMITTAL DEADLINES

Semi - Annual Monitoring Period: January 1 – June 30, July 1 – December 31

Semi -Annual Monitoring Report: August 1, 2009 and February 1, 2010 and subsequent years

Annual Compliance Period: January 1 – December 31

Annual Compliance Certification: February 1, 2009 and subsequent years

Note that the Semi-Annual Monitoring Reports and Annual Compliance Certifications must be received at the Division office by 5:00 p.m. on the due date. Postmarked dates will not be accepted for the

purposes of determining the timely receipt of those reports/certifications.

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SECTION I - General Activities and Summary

1. Permitted Activities

1.1 This is a natural gas gathering facility as defined under Standard Industrial Classification 1311. It consists of field compression, natural gas dehydration, and atmospheric storage tanks. Gas is compressed to specification for transmission using six (6) Internal Combustion Engines to power compressor units. All engines are controlled with an oxidation catalyst for control of CO and Formaldehyde emissions. Other activities conducted on site include dehydration of the gas through contact with triethylene glycol, gravity separation of condensates, and condensate truck loadout. The dehydrators and condensate tanks are equipped with a vapor recovery unit to control VOC emissions.

The facility is located in the SE ¼ of SE ¼ of Section 1, T7S, R93W in Garfield County. This facility is located in an area designated attainment for all pollutants.

There are no affected states within 50 miles of the plant. The following Federal Class I designated areas are within 100 kilometers of the plant: Black Canyon of the Gunnison National Park, West Elk Wilderness Area, Flattops Wilderness Area, Maroon Bells – Snowmass Wilderness Area, Colorado National Monument, and the Gunnison Gorge Recreation Area. Colorado National Monument and the Gunnison Gorge Recreation Area are not Federal Class I Areas, but have been designated by the State to have the same sulfur dioxide increment as a Federal Class I area.

- 1.2 Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air pollutants from this facility in accordance with the requirements, limitations, and conditions of this permit.
- 1.3 The Operating Permit incorporates the applicable requirements contained in the underlying construction permits, and does not affect those applicable requirements, except as modified during review of the application or as modified subsequent to permit issuance using the modification procedures found in Regulation No. 3, Part C. These Part C procedures meet all applicable substantive New Source Review requirements of Part B. Any revisions made using the provisions of Regulation No. 3, Part C shall become new applicable requirements for purposes of this Operating Permit and shall survive reissuance. This permit incorporates the applicable requirements (except as noted in Section II) from the following construction permits: 02GA0231, 02GA0232, 02GA0233, 02GA0944, 03GA0378, 03GA0763, 10GA1221, 10GA1222, 10GA1223.
- All conditions in this permit are enforceable by US Environmental Protection Agency, Colorado Air Pollution Control Division (hereinafter Division) and its agents, and citizens unless otherwise specified. **State-only enforceable conditions are:** Permit Condition Number(s): Section II Condition 3.7.1 and Section IV Conditions 14, 18, 3.d & 3.g (last paragraph)

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1.5 All information gathered pursuant to the requirements of this permit is subject to the Recordkeeping and Reporting requirements listed under Condition 22 of the General Conditions in Section IV of this permit. Either electronic or hard copy records are acceptable.

2. Alternative Operating Scenarios (ver 10/1/2011)

The following Alternative Operating Scenario (AOS) for the temporary and permanent replacement of natural gas fired reciprocating internal combustion engines has been reviewed in accordance with the requirements of Regulation No. 3., Part A, Section IV.A, Operational Flexibility-Alternative Operating Scenarios, Regulation No. 3, Part B, Construction Permits, and Regulation No. 3, Part D, Major Stationary Source New Source Review and Prevention of Significant Deterioration, and it has been found to meet all applicable substantive and procedural requirements. This permit incorporates and shall be considered a Construction Permit for any engine replacement performed in accordance with this AOS, and the permittee shall be allowed to perform such engine replacement without applying for a revision to this permit or obtaining a new Construction Permit.

2.1 Engine Replacement

The following AOS is incorporated into this permit in order to deal with a compressor engine breakdown or periodic routine maintenance and repair of an existing onsite engine that requires the use of either a temporary or permanent replacement engine. "Temporary" is defined as in the same service for 90 operating days or less in any 12 month period. "Permanent" is defined as in the same service for more than 90 operating days in any 12 month period. The 90 days is the total number of days that the engine is in operation. If the engine operates only part of a day, that day shall count as a single day towards the 90-day total. The compliance demonstrations and any periodic monitoring required by this AOS are in addition to any compliance demonstrations or periodic monitoring required by this permit.

All replacement engines are subject to all federally applicable and state-only requirements set forth in this permit (including monitoring and record keeping), and shall be subject to any shield afforded by this permit.

The results of all tests and the associated calculations required by this AOS shall be submitted to the Division within 30 calendar days of the test or within 60 days of the test if such testing is required to demonstrate compliance with NSPS or MACT requirements. Results of all tests shall be kept on site for five (5) years and made available to the Division upon request.

The permittee shall maintain a log on-site and contemporaneously record the start and stop date of any engine replacement, the manufacturer, date of manufacture, model number, horsepower, and serial number of the engine(s) that are replaced during the term of this permit, and the manufacturer, model number, horsepower, and serial number of the replacement engine. In addition to the log, the permittee shall maintain a copy of all Applicability Reports required under section 2.1.2 and make them available to the Division upon request.

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2.1.1 The permittee may **temporarily** replace an existing compressor engine that is subject to the emission limits set forth in this permit with an engine that is of the same manufacturer, model, and horsepower or a different manufacturer, model, or horsepower as the existing engine without modifying this permit, so long as the temporary replacement engine complies with all permit limitations and other requirements applicable to the existing engine. Measurement of emissions from the temporary replacement engine shall be made as set forth in section 2.2.

The permittee may temporarily replace a grandfathered or permit exempt engine or an engine that is not subject to emission limits without modifying this permit. In this circumstance, potential annual emissions of NO_x and CO from the temporary replacement engine must be less than or equal to the potential annual emissions of NO_x and CO from the original grandfathered or permit exempt engine or for the engine that is not subject to emission limits, as determined by applying appropriate emission factors (e.g. AP-42 or manufacturer's emission factors)

2.1.2 The permittee may **permanently** replace the existing compressor engine for the emission points specified in Table 1 with the manufacturer, model, and horsepower engines listed in Table 1 without modifying this permit so long as the permanent replacement engine complies with all permit limitations and other requirements applicable to the existing engine as well as any new applicable requirements for the replacement engine. Measurement of emissions from the permanent replacement engine and compliance with the applicable emission limitations shall be made as set forth in section 2.2.

An Air Pollutant Emissions Notice (APEN) that includes the specific manufacturer, model and serial number and horsepower of the permanent replacement engine shall be filed with the Division for the permanent replacement engine within 14 calendar days of commencing operation of the replacement engine. The APEN shall be accompanied by the appropriate APEN filing fee, a cover letter explaining that the permittee is exercising an alternative operating scenario and is installing a permanent replacement engine, and a copy of the relevant Applicability Reports for the replacement engine. Example Applicability Reports can be found in Appendix A. This submittal shall be accompanied by a certification from the Responsible Official indicating that "based on the information and belief formed after reasonable inquiry, the statements and information included in the submittal are true, accurate and complete".

This AOS cannot be used for permanent engine replacement of a grandfathered or permit exempt engine or an engine that is not subject to emission limits.

The permittee shall agree to pay fees based on the normal permit processing rate for review of information submitted to the Division in regard to any permanent engine replacement.

2.2 Portable Analyzer Testing

Note: In some cases there may be conflicting and/or duplicative testing requirements due to overlapping Applicable Requirements. In those instances, please contact the Division Field Services Unit to discuss streamlining the testing requirements.

Note that the testing required by this Condition may be used to satisfy the periodic testing requirements specified by the permit for the relevant time period (i.e. if the permit requires quarterly portable analyzer testing, this test conducted under the AOS will serve as the quarterly test and an additional portable analyzer test is not required for another three months).

The permittee may conduct a reference method test, in lieu of the portable analyzer test required by this Condition, if approved in advance by the Division.

The permittee shall measure nitrogen oxide (NO_X) and carbon monoxide (CO) emissions in the exhaust from the replacement engine using a portable flue gas analyzer within seven (7) calendar days of commencing operation of the replacement engine.

All portable analyzer testing required by this permit shall be conducted using the Division's Portable Analyzer Monitoring Protocol (ver March 2006 or newer).

Results of the portable analyzer tests shall be used to monitor the compliance status of this unit.

For comparison with an annual (tons/year) or short term (lbs/unit of time) emission limit, the results of the tests shall be converted to a lb/hr basis and multiplied by the allowable operating hours in the month or year (whichever applies) in order to monitor compliance. If a source is not limited in its hours of operation the test results will be multiplied by the maximum number of hours in the month or year (8760), whichever applies.

For comparison with a short-term limit that is either input based (lb/mmBtu), output based (g/hp-hr) or concentration based (ppmvd @ 15% O₂) that the existing unit is currently subject to or the replacement engine will be subject to, the results of the test shall be converted to the appropriate units as described in the above-mentioned Portable Analyzer Monitoring Protocol document.

If the portable analyzer results indicate compliance with both the NO_X and CO emission limitations, in the absence of credible evidence to the contrary, the source may certify that the engine is in compliance with both the NO_X and CO emission limitations for the relevant time period.

Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, if the portable analyzer results fail to demonstrate compliance with either the NO_X or CO emission limitations, the engine will be considered to be out of compliance from the date of the portable analyzer test until a portable analyzer test indicates compliance with both the NO_X and CO emission limitations or until the engine is taken offline.

2.3 Applicable Regulations for Permanent Engine Replacements

2.3.1 Reasonably Available Control Technology (RACT): Reg 3, Part B § II.D.2

All permanent replacement engines that are located in an area that is classified as attainment/maintenance or nonattainment must apply Reasonably Available Control Technology (RACT) for the pollutants for which the area is attainment/maintenance or nonattainment. Note that both VOC and NO_X are precursors for ozone. RACT shall be applied for any level of emissions of the pollutant for which the area is in attainment/maintenance or nonattainment, except as follows:

In the Denver Metropolitan PM_{10} attainment/maintenance area, RACT applies to PM_{10} at any level of emissions and to NO_X and SO_2 , as precursors to PM_{10} , if the potential to emit of NO_X or SO_2 exceeds 40 tons/yr.

For purposes of this AOS, the following shall be considered RACT for natural-gas fired reciprocating internal combustion engines:

VOC: The emission limitations in NSPS JJJJ CO: The emission limitations in NSPS JJJJ

NO_X: The emission limitations in NSPS JJJJ SO₂: Use of natural gas as fuel

 PM_{10} : Use of natural gas as fuel

As defined in 40 CFR Part 60 Subparts GG (§ 60.331) and 40 CFR Part 72 (§ 72.2), natural gas contains 20.0 grains or less of total sulfur per 100 standard cubic feet.

2.3.2 Control Requirements and Emission Standards: Regulation No. 7, Sections XVI. and XVII.E (State-Only conditions).

Control Requirements: Section XVI

Any permanent replacement engine located within the boundaries of an ozone nonattainment area is subject to the applicable control requirements specified in Regulation No. 7, section XVI, as specified below:

Rich burn engines with a manufacturer's design rate greater than 500 hp shall use a non-selective catalyst and air fuel controller to reduce emission.

Lean burn engines with a manufacturer's design rate greater than 500 hp shall use an oxidation catalyst to reduce emissions.

The above emission control equipment shall be appropriately sized for the engine and shall be operated and maintained according to manufacturer specifications.

The source shall submit copies of the relevant Applicability Reports required under Condition 2.1.2.

Emission Standards: Section XVII.E – State-only requirements

Any permanent engine that is either constructed or relocated to the state of Colorado from another state, after the date listed in the table below shall operate and maintain each engine according to the manufacturer's written instructions or procedures to the extent

practicable and consistent with technological limitations and good engineering and maintenance practices over the entire life of the engine so that it achieves the emission standards required in the table below:

Max Engine HP	Construction or Relocation Date	Emissio	n Standards in C	G/hp-hr
		NO_X	СО	VOC
100 <hp<500< td=""><td>January 1, 2008</td><td>2.0</td><td>4.0</td><td>1.0</td></hp<500<>	January 1, 2008	2.0	4.0	1.0
	January 1, 2011	1.0	2.0	0.7
500 <u><</u> Hp	July 1, 2007	2.0	4.0	1.0
	July 1, 2010	1.0	2.0	0.7

The source shall submit copies of the relevant Applicability Reports required under Condition 2.1.2.

2.3.3 NSPS for stationary spark ignition internal combustion engines: 40 CFR Part 60, Subpart JJJJ

A permanent replacement engine that is manufactured on or after 7/1/09 for emergency engines greater than 25 hp, 7/1/2008 for engines less than 500 hp, 7/1/2007 for engines greater than or equal to 500 hp except for lean burn engines greater than or equal to 500 hp and less than 1,350 hp, and 1/1/2008 for lean burn engines greater than or equal to 500 hp and less than 1,350 hp are subject to the requirements of 40 CFR Part 60, Subpart JJJJ. An analysis of applicable monitoring, recordkeeping, and reporting requirements for the permanent engine replacement shall be included in the Applicability Reports required under Condition 2.1.2. Any testing required by the NSPS is in addition to that required by this AOS. Note that the initial test required by NSPS Subpart JJJJ can serve as the testing required by this AOS under Condition 2.2, if approved in advance by the Division, provided that such test is conducted within the time frame specified in Condition 2.2.

Note that under the provisions of Regulation No. 6. Part B, section I.B. that Relocation of a source from outside of the State of Colorado into the State of Colorado is considered to be a new source, subject to the requirements of Regulation No. 6 (i.e., the date that the source is first relocated to Colorado becomes equivalent to the manufacture date for purposes of determining the applicability of NSPS JJJJ requirements).

However, as of October 1, 2011 the Division has not yet adopted NSPS JJJJ. Until such time as it does, any engine subject to NSPS will be subject only under Federal law. Once the Division adopts NSPS JJJJ, there will be an additional step added to the determination of the NSPS. Under the provisions of Regulation No. 6, Part B, § I.B (which is referenced in Part A), any engine relocated from outside of the State of Colorado into the State of Colorado is considered to be a new source, subject to the requirements of NSPS JJJJ.

2.3.4 Reciprocating internal combustion engine (RICE) MACT: 40 CFR Part 63, Subpart ZZZZ

A permanent replacement engine located at either an area or major source is subject to the requirements in 40 CFR Part 63, Subpart ZZZZ. An analysis of the applicable monitoring, recordkeeping, and reporting requirements for the permanent engine replacement shall be included in the Applicability Reports required under Condition 2.1.2. Any testing required by the MACT is in addition to that required by this AOS. Note that the initial test required by the MACT can serve as the testing required by this AOS under Condition 2.2, if approved in advance by the Division, provided that such test is conducted within the time frame specified in Condition 2.2.

2.4 **Additional Sources**

The replacement of an existing engine with a new engine is viewed by the Division as the installation of a new emissions unit, not "routine replacement" of an existing unit. The AOS is therefore essentially an advanced construction permit review. The AOS cannot be used for additional new emission points for any site; an engine that is being installed as an entirely new emission point and not as part of an AOSapproved replacement of an existing onsite engine has to go through the appropriate Construction/Operating permitting process prior to installation.

Emission Point Replacement Engine Periodic Monitoring CE01 Caterpillar G3612 TALE, 3,506 hp, Portable Monitoring with oxidation catalyst Quarterly

MACT Status New 4-stroke lean burn **CE02** Caterpillar G3612 TALE, 3,506 hp, Portable Monitoring New 4-stroke lean burn Quarterly with oxidation catalyst **CE03** Caterpillar G3612 TALE, 3,506 hp, Portable Monitoring New 4-stroke lean burn with oxidation catalyst Quarterly CE04 Caterpillar G3612 TALE, 3,506 hp, Portable Monitoring Existing 4-stroke lean Quarterly with oxidation catalyst burn **CE05** Caterpillar 3612 TALE, 3550 hp, with Portable Monitoring New 4-stroke lean burn oxidation catalyst Quarterly Caterpillar 3616 TALE, 4735 hp, with Portable Monitoring **CE06** New 4-stroke lean burn oxidation catalyst Quarterly

Table 1

Prevention of Significant Deterioration 3.

This facility is located in an area designated attainment for all pollutants. Based on the 3.1 information provided by the applicant, this facility is not categorized as a major stationary source (no single criteria pollutant emissions with a Potential to Emit of greater than 250 TPY) at the issuance date of this permit. The source therefore is not subject to the Prevention of Significant Deterioration (PSD) review requirements of 40 CFR 52.21 (Colorado Regulation 3, Part D, Section VI).

Operating Permit 12OPGA363 Last Revised: March 21, 2012 Future modifications to this facility, which are major by itself, will result in the application of the PSD review requirements. In addition, future modifications at this facility may result in the facility being classified as a major stationary source. Once that threshold is exceeded, future modifications at this facility resulting in a significant net emissions increase (see Reg. 3, Part D, Sections II.A.27 and 44) for any pollutant as listed in Regulation No. 3, Part D, Section II.A.44 or a modification which is major by itself may result in the application of the PSD review requirements.

3.2 There are no other Operating Permits associated with this facility for purposes of determining applicability of Prevention of Significant Deterioration regulations.

4. Accidental Release Prevention Program (112(r))

4.1 Based upon the information provided by the applicant, this facility is not subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act).

5. Compliance Assurance Monitoring (CAM)

5.1 The following emission points at this facility use a control device to achieve compliance with an emission limitation or standard to which they are subject and have pre-control emissions that exceed or are equivalent to the major source threshold. They are therefore subject to the provisions of the CAM program as set forth in 40 CFR Part 64, as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV:

None

6. **Summary of Emission Units**

The emissions units regulated by this permit are the following: 6.1

AIRS Point Number	Facility Identifier	Description	Pollution Control Device
001	CE01	Caterpillar Model G3612 TALE, 4 Cycle low-NO _X Internal Combustion Engine rated at 3506 HP @ 1000 rpm and 130° F aftercooler inlet temperature, SN: 1YG00251, Natural Gas Fired.	Oxidation Catalyst
002	CE02	Caterpillar Model G3612 TALE, 4 Cycle low-NO _X Internal Combustion Engine rated at 3506 HP @ 1000 rpm and 130° F aftercooler inlet temperature, SN: BKE00246, Natural Gas Fired.	Oxidation Catalyst
003	CE03	Caterpillar Model G3612 TALE, 4 Cycle low-NO _X Internal Combustion Engine rated at 3506 HP @ 1000 rpm and 130° F aftercooler inlet temperature, SN: BKE00201, Natural Gas Fired.	Oxidation Catalyst
004	CE04	Caterpillar Model G3612 TALE, 4 Cycle low-NO _X Internal Combustion Engine rated at 3506 HP @ 1000 rpm and 130° F aftercooler inlet temperature, SN: 1YG00168, Natural Gas Fired.	Oxidation Catalyst
009	CE05	Caterpillar Model 3612 TALE, 4 Cycle low-NO _X Internal Combustion Engine rated at 3550 HP @ 1000 rpm. Natural Gas Fired.	Oxidation Catalyst
010	CE06	Caterpillar Model 3616 TALE, 4 Cycle low-NO _X Internal Combustion Engine rated at 4735 HP @ 1000 rpm. Natural Gas Fired.	Oxidation Catalyst
011	DU04	Exterran Triethylene Glycol Dehydrator Design Rated at 150 MMscf/day, Equipped with reboiler, flash tank and associated still vent SN: CL08-741	Condenser and a skid mounted vapor recovery unit (VRU)
005	TK01-TK04, TK08-TK09	Condensate storage tank battery: Four 300 bbl and Two 500 bbl	Skid mounted vapor recovery unit (VRU)
006	FG01	Fugitive emissions of VOCs from equipment leaks.	None
007	LO01	Condensate truck loadout	None

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SECTION II - Specific Permit Terms

1. CE-01, CE-02, CE-03 and CE-04: Four (4) Caterpillar G3612 TALE, 3,506 hp engines with oxidation catalysts

Note: These limits apply to **each engine** unless otherwise specified.

Parameter Permit		Limitations	Compliance	Monitoring	
	Condition Number		Emission Factor	Method	Interval
NO _X	1.1	27.8 ton/yr	0.213 lb/MMBtu	Record keeping	Monthly
VOC		28.3 ton/yr	0.217 lb/MMBtu	and calculation	
CO		24.6 ton/yr	0.189 lb/MMBtu		
Natural Gas Consumption	1.2	226.0 MMscf per year		Fuel Meter	Monthly
Opacity	1.3	Not to Exceed 20% Except as Provided for Below For Startup – Not to Exceed 30%, for a Period or Periods Aggregating More than Six (6) Minutes in any 60 Consecutive Minutes		Fuel Restriction	Only Natural Gas is Used as Fuel
Portable Monitoring	1.4			Flue Gas Analyzer	Quarterly
Btu content of natural gas	1.5			ASTM or other Division Approved Method	Semi-Annually
Catalyst Parameters	1.6	CE-04 only: Within manufacturer's recommended operating range		Recordkeeping	Pressure – monthly Temperature - daily
Operation & Maintenance	1.7			See Co	ondition 1.7
MACT ZZZZ Requirements	1.8	See Cond	dition 1.8 – All Engi	nes Except CE-04	
General Provisions	1.9				

CE-05: Caterpillar 3612 TALE, 3,550 hp engine with oxidation catalyst

Parameter	Permit	Limita	ations	Compliance	Monitoring		
	Condition Number	Short Term	Long Term	Emission Factor	Method	Interval	
NO_X	1.1	4,076 lbs/mo	24.0 ton/yr	0.182 lb/MMBtu	Record keeping and	Monthly	
VOC		4,076 lbs/mo	24.0 ton/yr	0.182 lb/MMBtu	calculation		
CO		1,019 lbs/mo	6.0 ton/yr	0.045 lb/MMBtu			
Natural Gas Consumption	1.2	22.0 MMscf per month	259.0 MMscf per year		Fuel Meter	Monthly	
Opacity	1.3	Provided for For Startup – National Startup – Natio	Not to Exceed iod or Periods ore than Six (6) 60 Consecutive		Fuel Restriction	Only Natural Gas is Used as Fuel	
Portable Monitoring	1.4	171111			Flue Gas Analyzer	Quarterly	
Btu content of natural gas	1.5				ASTM or other Division Approved Method	Semi-Annually	
Operation & Maintenance	1.7				See Con	dition 1.7	
MACT ZZZZ Requirements	1.8	See Condition 1.8					
General Provisions	1.9						
Stack Height	1.10	≥ 40	feet				
NSPS JJJJ	1.11	See Condi	tion 1.11		See Cond	dition 1.11	

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CE-06: Caterpillar 3616 TALE, 4,735 hp engine with oxidation catalyst

Parameter	-		Compliance	Monitoring		
	Condition Number	Short Term	Long Term	Emission Factor	Method	Interval
NO_X	1.1	3,883 lbs/mo	22.9 ton/yr	0.129 lb/MMBtu	Record keeping and	Monthly
VOC		5,437 lbs/mo	32.0 ton/yr	0.180 lb/MMBtu	calculation	
СО		1,495 lbs/mo	8.8 ton/yr	0.049 lb/MMBtu		
Natural Gas Consumption	1.2	29.7 MMscf per month	350.0 MMscf per year		Fuel Meter	Monthly
Opacity	1.3	Provided to For Startup – It 30%, for a Per Aggregating Mo	Not to Exceed 20% Except as Provided for Below For Startup – Not to Exceed 30%, for a Period or Periods Aggregating More than Six (6) Minutes in any 60 Consecutive		Fuel Restriction	Only Natural Gas is Used as Fuel
Portable Monitoring	1.4				Flue Gas Analyzer	Quarterly
Btu content of natural gas	1.5				ASTM or other Division Approved Method	Semi-Annually
Operation & Maintenance	1.7				See Con	dition 1.7
MACT ZZZZ Requirements	1.8		See Condition 1.8			
General Provisions	1.9					
Stack Height	1.10	≥ 40	feet			
NSPS JJJJ	1.11	See Condi	ition 1.11		See Cond	lition 1.11
Performance Testing	1.12	See Condi	ition 1.12		See Cond	lition 1.12

1.1 Nitrogen Oxide (NO_X), Carbon Monoxide (CO), and Volatile Organic Compound (VOC) emissions from this engine shall not exceed the limitations stated in Summary Table 1 above (Construction Permits 02GA0231, 02GA0232, 02GA0233, 02GA0944, 10GA1221, 10GA1222, as modified under the provisions of Section II, Condition 1.3 and Regulation No. 7, Section XVII.E.2.b). Except as provided below, the emission factors listed above have been approved by the Division and shall be used to calculate emissions from this engine as follows:

Monthly emissions of each pollutant shall be calculated by the end of the subsequent month using the above Compliance Emission Factors (CEF), the monthly natural gas consumption and the higher heating value of the natural gas in the equation below (as required by the most recent test in Condition 1.5):

 $Tons/mo = \underbrace{CEF (lbs/MMBtu) \ x \ Monthly \ Nat. \ Gas \ Use \ (MMscf/mo) \ x \ Heat \ Content \ of \ Nat. \ Gas \ (MMBTU/MMscf)}_{2000 \ lbs/ton}$

A twelve-month rolling total of emissions will be maintained in order to monitor compliance with the annual emission limitation. Each month, a new twelve month total shall be calculated using the previous twelve months data. The short term emission limits for **engines CE-05** and **CE-06** are only applicable for the first twelve months of operation.

If the results of the portable analyzer testing conducted under the provisions of condition 1.4 show that either the NO_X or CO emission rates/factors are greater than those listed above, and in the absence of subsequent testing results to the contrary (as approved by the Division), the permittee shall apply for a modification to this permit to reflect, at a minimum, the higher emission rates/factors within 60 days of the completion of the test.

- 1.2 Natural Gas Consumption for the engines shall not exceed the limitations shown in Summary Table 1 above. (Construction Permit 02GA0231, 02GA0232, 02GA0233, 02GA0944, 10GA1221, 10GA1222, as modified under the provisions of Section II, condition 1.3). By the end of each month, the fuel meter data shall be compiled and recorded. A twelve-month rolling total shall be maintained for demonstration of compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data. The short term natural gas consumption limits for **engines CE-05 and CE-06** are only applicable for the first twelve months of operation. Records of the calculations and compliance determinations shall be maintained and made available to the Division for review upon request.
- 1.3 Visible emissions shall not exceed 20% opacity (Colorado Regulation No. 1, Section II.A.1) except during periods of startup when visible emissions shall not exceed 30% opacity for a period or periods aggregating more than six (6) minutes in any sixty (60) consecutive minutes (Colorado Regulation No. 1, Section II.A.4). This opacity standard applies to **each engine.** In the absence of credible evidence to the contrary, compliance with the opacity limit shall be presumed since only natural gas is permitted to be used as fuel for these engines.
- 1.4 Portable Monitoring (ver. 6/1/2006). Emission measurements of nitrogen oxides (NO_X) and carbon monoxide (CO) shall be conducted quarterly using a portable flue gas analyzer. At least one calendar month shall separate the quarterly tests. Note that if the engine is operated for less than 100 hrs in any quarterly period, then the portable monitoring requirements do not apply.

All portable analyzer testing required by this permit shall be conducted using the Division's Portable Analyzer Monitoring Protocol (ver March 2006 or newer) as found on the Division's website at: http://www.cdphe.state.co.us/ap/down/portanalyzeproto.pdf

Results of the portable analyzer tests shall be used to monitor the compliance status of this unit. For comparison with an annual or short term emission limit, the results of the tests shall be converted to a lb/hr basis and multiplied by the allowable operating hours in the month or year (whichever applies) in order to monitor compliance. If a source is not limited in its hours of

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operation the test results will be multiplied by the maximum number of hours in the month or year (8760), whichever applies.

If the portable analyzer results indicate compliance with both the NO_X and CO emission limitations, in the absence of credible evidence to the contrary, the source may certify that the engine is in compliance with both the NO_X and CO emission limitations for the relevant time period.

Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, if the portable analyzer results fail to demonstrate compliance with either the NO_X or CO emission limitations, the engine will be considered to be out of compliance from the date of the portable analyzer test until a portable analyzer test indicates compliance with both the NO_X and CO emission limitations or until the engine is taken offline.

For comparison with the emission rates/factors, the emission rates/factors determined by the portable analyzer tests and approved by the Division shall be converted to the same units as the emission rates/factors in the permit. If the portable analyzer tests shows that either the NO_X or CO emission rates/factors are greater than the relevant ones set forth in the permit, and in the absence of subsequent testing results to the contrary (as approved by the Division), the permittee shall apply for a modification to this permit to reflect, at a minimum, the higher emission rate/factor within 60 days of the completion of the test.

Results of all tests conducted shall be kept on site or at a local field office and made available to the Division upon request.

- 1.4.1 The outlet oxygen content of the exhaust stream shall be measured and recorded during portable monitoring when measurement of the outlet CO content is being conducted.
- 1.5 The Btu content of the natural gas used to fuel these engines shall be verified semi-annually using the appropriate ASTM Methods or equivalent, if approved in advance by the Division. The Btu content of the natural gas shall be based on the higher heating value (HHV) of the fuel. Calculations of monthly emissions shall be made using the heat content derived from the most recent required analysis. (Construction Permits 02GA0231, 02GA0232, 02GA0233, 02GA0944 as modified under the provisions of Section I, Condition 1.3).
- 1.6 **CE-04 only:** Parameters associated with the oxidation catalysts shall be monitored as follows:
 - 1.6.1 The pressure drop across the catalyst shall be monitored and recorded monthly. The catalyst must be maintained so that the pressure drop across the catalyst does not change by more than two inches of water at 100 percent load plus or minus ten percent from the pressure drop across the catalyst that was measured during the initial performance test. If the pressure is outside this range, then the appropriate maintenance shall be performed to bring the pressure back into range. In lieu of maintenance, the source may choose to perform a portable analyzer test of the engine to establish a new pressure drop value. If

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the test demonstrates that the engine is in compliance with its emission limits, the pressure drop value at which the engine is tested shall become the new baseline.

- 1.6.2 The catalyst shall be cleaned, reconditioned, and replaced per the manufacturer's recommended schedule and a copy of maintenance records shall be kept. If the catalyst cleaning, reconditioning, and replacement depends on hours of operation then the source shall track the hours of operation for the engine. For new, cleaned, or reconditioned catalyst(s) on an existing engine, the new pressure drop baseline must be established by the operator within the first 7 days of engine/catalyst operation and re-established during the next regularly scheduled emission test. For new cleaned or reconditioned catalyst(s) on a new engine, the new pressure drop baseline must be established within the first one hundred and eighty (180) days of engine operation.
- The temperature of the stationary RICE exhaust shall be maintained so that the catalyst 1.6.3 inlet temperature is greater than or equal to 450 ° F and less than or equal to 1350 ° F. The inlet temperature shall be recorded daily.
- 1.7 These engines and associated control devices shall be operated and maintained in accordance with internal operating and maintenance standards, which shall consider manufacturer's recommendations and good engineering practices, at all times, including periods of start-up, shut-down and malfunction.
- 1.8 All engines except CE-04 are subject to the requirements in 40 CFR Part 63 Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines", as adopted by reference in Colorado Regulation No. 8, Part E, Section III, including, but not limited to the following:

Note that as of the date of revised permit issuance [March 21, 2012] the requirements in 40 CFR Part 63 Subpart ZZZZ (those provisions published in the August 20, 2010 Federal Register) have not been adopted into Colorado Regulation No. 8, Part E by the Division and are therefore not state-enforceable. In the event that the Division adopts these requirements, these requirements will become both state and federally enforceable.

1.8.1 General Requirements:

- 1.8.1.1 These units must be in compliance with the emission limitations and operating limitations in Conditions 1.8.2 and 1.8.3 at all times, except during periods of startup, shutdown and malfunction (40 CFR Part 63 Subpart ZZZZ § 63.6605(a))
- 1.8.1.2 These units, including air pollution control and monitoring equipment, shall be operated and maintained in a manner consistent with good air pollution control practices for minimizing emissions at all time, including during startup, shutdown and malfunction (40 CFR Part 63 Subpart ZZZZ § 63.6605(b)).
- Emission Limitations: Carbon Monoxide (CO) emissions from these engines must be reduced by 93 percent or more (40 CFR Part 63 Subpart ZZZZ § 63.6600(b), Table 2a, item 2).

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- 1.8.3 Operating Limitations: These units are subject to the following operating limitations (40 CFR Part 63 Subpart ZZZZ § 63.6600(b), Table 2b, item1):
 - 1.8.3.1 The catalyst must be maintained so that the pressure drop across the catalyst does not change my more than two inches of water at 100 percent load plus or minus ten percent from the pressure drop across the catalyst that was measured during the initial performance test; and
 - 1.8.3.2 The temperature of the stationary RICE exhaust shall be maintained so that the catalyst inlet temperature is greater than or equal to 450 ° F and less than or equal to 1350 ° F.
- 1.8.4 <u>Initial Testing and Compliance Requirements:</u> An initial performance test shall be conducted no later than 180 days after start up of the source to measure the O₂ and CO at the inlet and outlet of the control device using a portable CO and O₂ analyzer in accordance with the requirements in ASTM D6522-00 (incorporated by reference, see § 63.14). The CO concentration must be at 15% O₂ on a dry basis. Measurements to determine O₂ must be made at the same time as the measurements for CO concentration (40 CFR Part 63 Subpart ZZZZ § 63.6610(a), Table 4, item 1 and (b) or item 2)
- 1.8.5 <u>Subsequent Performance Test Requirements:</u> Subsequent performance tests shall be conducted semi-annually. After compliance has been demonstrated for two consecutive tests, the frequency of semi-annual tests may be reduced to annually. If the results of any subsequent annual performance test indicates the stationary RICE is not in compliance with the CO emission limitations, or you deviate from any of your operating limitations, you must resume semi-annual performance tests (40 CFR Part 63 Subpart ZZZZ § 63.6615, Table 3, item 1).
- 1.8.6 <u>Performance Tests and Other Procedures:</u> Each of the performance tests conducted under Conditions 1.8.4 and 1.8.5 are subject to the following requirements:
 - 1.8.6.1 Each performance test must be conducted according to the requirements in § 63.7(e)(1) and under the conditions specified in Condition 1.9.3. The test must be conducted at any load condition plus or minus 10 percent of 100 percent load (40 CFR Part 63 Subpart ZZZZ § 63.6620(b)).
 - 1.8.6.2 You may not conduct performance tests during periods of startup, shutdown, or malfunction, as specified in § 63.7(e)(1) (40 CFR Part 63 Subpart ZZZZ § 63.6620(c)).
 - 1.8.6.3 You must conduct three separate test runs for each performance test required in Conditions 1.8.4 and 1.8.5 as specified in § 63.7(e)(3). Each test run must last at least 1 hour (40 CFR Part 63 Subpart ZZZZ § 63.6620(d)).
 - 1.8.6.4 You must use the equation below to determine compliance with the percent reduction requirements (40 CFR Part 63 Subpart ZZZZ § 63.6620(e)(1)).

$$\frac{C_i - C_o}{C_i} x \ 100 = R$$

Where:

C_i = concentration of CO at the control device inlet

 $C_0 =$ concentration of CO at the control device outlet, and

R = percent reduction of CO emissions.

- 1.8.6.5 You must normalize the carbon monoxide (CO) concentrations at the inlet and outlet of the control device to a dry basis and to 15 percent oxygen, or an equivalent percent of carbon dioxide (CO₂). If pollutant concentrations are to be corrected to 15 percent oxygen and CO₂ concentration is measured in lieu of oxygen concentration measurement, a CO₂ correction factor is needed. Calculate the CO₂ correction factor in accordance with the requirements in § 63.6620(e)(2)(i) and (ii)) (40 CFR Part 63 Subpart ZZZZ § 63.6620(e)(2)).
- 1.8.6.6 The engine percent load during a performance test must be determined by documenting the calculations, assumptions, and measurement devices used to measure or estimate the percent load in a specific application. A written report of the average percent load determination must be included in the notification of compliance status. The following information must be included in the written report: the engine model number, the engine manufacturer, the year of purchase, the manufacturer's site-rated brake horsepower, the ambient temperature, pressure, and humidity during the performance test, and all assumptions that were made to estimate or calculate percent load during the performance test must be clearly explained. If measurement devices such as flow meters, kilowatt meters, beta analyzers, stain gauges, etc. are used, the model number of the measurement device, and an estimate of its accuracy in percentage of true value must be provided (40 CFR Part 63 Subpart ZZZZ § 63.6620(i))
- 1.8.7 <u>Monitoring, Installation, Operation and Maintenance Requirements:</u> You must install, maintain and operate a continuous parametric monitoring system (CPMS) to continuously monitor the catalyst inlet temperature in accordance with the requirements in §63.8 (40 CFR Part 63 Subpart ZZZZ § 63.6625(b), Table 5, item 1)
- 1.8.8 <u>Demonstrate Initial Compliance with Emissions and Operating Limitations</u>: Initial compliance shall be demonstrated as follows:
 - 1.8.8.1 The average reduction of emissions of CO determined from the initial performance test achieves the required CO percent reduction and a CPMS to continuously monitor catalyst inlet temperature has been installed in accordance

- with the requirements in Condition 1.8.7 (40 CFR Part 63 Subpart ZZZZ § 63.6630(a), Table 5, items 1.i and ii).
- 1.8.8.2 You have recorded the catalyst pressure drop and catalyst inlet temperature during the initial performance test (40 CFR Part 63 Subpart ZZZZ § 63.6630(b), Table 5, item 1.iii)
- 1.8.8.3 You must submit the Notification of Compliance status containing the results of the initial compliance demonstration according to the requirements in Condition 1.9.3 (40 CFR Part 63 Subpart ZZZZ § 63.6630(c))
- 1.8.9 <u>Monitoring and Collecting Data for Continuous Compliance</u>: Data must be monitored and collected in accordance with the following (40 CFR Part 63 Subpart ZZZZ § 63.6635(a)):
 - 1.8.9.1 Except for monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), you must monitor continuously at all times that the stationary RICE is operating (40 CFR Part 63 Subpart ZZZZ § 63.6635(b)).
 - 1.8.9.2 You may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. You must however, use all the valid data collected during all other periods (40 CFR Part 63 Subpart ZZZZ § 63.6635(c)).
- 1.8.10 <u>Demonstrating Continuous Compliance with the Emission and Operating Limitations:</u>
 Continuous compliance with the emission and operating limitations shall be determined as follows:
 - 1.8.10.1 You must demonstrate continuous compliance with each emission and operating limitation in Conditions 1.8.2 and 1.8.3 as follows:
 - a. Conducting subsequent performance tests as specified in Condition 1.8.5 and demonstrating the required CO reduction (40 CFR Part 63 Subpart ZZZZ § 63.6640(a), Table 6, item 1.i).
 - b. Collecting the catalyst inlet temperature data according to Condition 1.8.7 and reducing these data to 4-hour rolling averages and maintaining the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature (40 CFR Part 63 Subpart ZZZZ § 63.6640(a), Table 6, items 1.ii thru iv).
 - c. Measuring the pressure drop across the catalyst once per month and demonstrating that the pressure drop across the catalyst is within the operating limitation established during the initial performance test (40 CFR Part 63 Subpart ZZZZ § 63.6640(a), Table 6, item 1.v).
 - 1.8.10.2 You must report each instance in which you did not meet each emission

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limitation or operating limitation in Conditions 1.8.2 and 1.8.3. These instances are deviations from the emission and operating limitations in Conditions 1.8.2 and 1.8.3. These deviations must be reported according to the requirements in Conditions 1.8.12.3 and 1.8.12.4. If you change your catalyst, you must reestablish the values of the operating parameters measured during the initial performance test. When you reestablish the values of your operating parameters, you must also conduct a performance test to demonstrate that you are meeting the required emission limitation applicable to your stationary RICE (40 CFR Part 63 Subpart ZZZZ § 63.6640(b)).

- 1.8.10.3 For new, reconstructed, and rebuilt stationary RICE, deviations from the emission or operating limitations that occur during the first 200 hours of operation from engine startup (engine burn-in period) are not violations. Rebuilt stationary RICE means a stationary RICE that has been rebuilt as that term is defined in 40 CFR § 94.11(a) (40 CFR Part 63 Subpart ZZZZ § 63.6640(d)).
- 1.8.10.4 You must also report each instance in which you did not meet the requirements in Condition 1.9 of this permit (40 CFR Part 63 Subpart ZZZZ § 63.6640(e)).

1.8.11 What Notifications to Submit and When:

- 1.8.11.1 You must submit all of the notifications in § 63.7(b) and (c), 63.8(e), (f)(4), and (f)(6), 63.9(b) through (e), and (g) and (h) that apply to you by the dates specified (40 CFR Part 63 Subpart ZZZZ § 63.6645(a)).
- 1.8.11.2 As specified in § 63.9(b)(2), if you start up your stationary RICE before the effective date of 40 CFR Part 63 Subpart ZZZZ, you must submit an Initial Notification not later than December 13, 2004 (40 CFR Part 63 Subpart ZZZZ § 63.6645(b)).
- 1.8.11.3 If you are required to conduct a performance test, you must submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required in § 63.7(b)(1) (40 CFR Part 63 Subpart ZZZZ § 63.6645(e)).
- 1.8.11.4 If you are required to conduct a performance test or other initial compliance demonstration as specified in Conditions 1.8.4 and 1.8.8, you must submit the Notification of Compliance Status before the close of the business on the 30th day following the completion of the initial compliance demonstration.

1.8.12 What Reports to Submit and When: Compliance Reports

- 1.8.12.1 Unless the Division has approved a different schedule for submission of reports under § 63.10(a), you must submit Compliance Reports in accordance with the following requirements:
 - a. The first Compliance report must cover the period beginning on the compliance date that is specified for your affected source in §63.6595 and

- ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in §63.6595 (40 CFR Part 63 Subpart ZZZZ § 63.6650(b)(1)). Note that the compliance date for this engine is March 23, 2008 as specified in Condition 63.6595(a)(3).
- The first Compliance report must be postmarked or delivered no later than b. July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in §63.6595 (40 CFR Part 63 Subpart ZZZZ § 63.6650(b)(2)).
- c. Each subsequent Compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31 (40 CFR Part 63 Subpart ZZZZ § 63.6650(b)(3)).
- d. Each subsequent Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period (40 CFR Part 63 Subpart ZZZZ § 63.6650(b)(4)).
- For each stationary RICE that is subject to permitting regulations pursuant e. to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6 (a)(3)(iii)(A), you may submit the first and subsequent Compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section (40 CFR Part 63 Subpart ZZZZ § 63.6650(b)(5)).
- 1.8.12.2 The Compliance Reports must include the information in § 63.6650(c)(1) thru (6) (40 CFR Part 63 Subpart ZZZZ § 63.6650(c)).
- 1.8.12.3 For each deviation from any emission or operating limitation that occurs for a stationary RICE where you are using a CPMS to comply with the emission and operating limitations in this subpart you must include information in § 63.6650(c)(1) thru (4) and (e)(1) thru (12) (40 CFR Part 63 Subpart ZZZZ § 63.6650(e)).
- 1.8.12.4 Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Condition 1.9.12 along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in this subpart, submission of the Compliance report shall be deemed to satisfy any obligation to report the same

Operating Permit 12OPGA363 Issued: September 1, 2009 deviations in the semiannual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority (40 CFR Part 63 Subpart ZZZZ § 63.6650(f)).

1.8.13 What Records to Keep:

- 1.8.13.1 A copy of each notification and report that you submitted to comply with this Condition 1.8, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in §63.10(b)(2)(xiv) (40 CFR Part 63 Subpart ZZZZ § 63.6655(a)(1)).
- 1.8.13.2The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction (40 CFR Part 63 Subpart ZZZZ § 63.6655(a)(2)).
- 1.8.13.3 Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii) (40 CFR Part 63 Subpart ZZZZ § 63.6655(a)(3)).
- 1.8.13.4 For each CPMS you must keep the following requirements (40 CFR Part 63 Subpart ZZZZ § 63.6655(b)(1) thru (3)):
 - a. Records described in §63.10(b)(2)(vi) through (xi).
 - b. Previous (i.e., superseded) versions of the performance evaluation plan as required in §63.8(d)(3).
 - c. Requests for alternatives to the relative accuracy test for CEMS or CPMS as required in §63.8(f)(6)(i), if applicable.
- 1.8.13.5 You must keep the records required in Condition 1.8.10.1 to show continuous compliance with each emission or operating limitation that applies to you (40 CFR Part 63 Subpart ZZZZ § 63.6655(d)).

1.8.14 Form and Length of Recordkeeping:

- 1.8.14.1 Your records must be in a form suitable and readily available for expeditious review according to § 63.10(b)(1) (40 CFR Part 63 Subpart ZZZZ § 63.6660(a)).
- 1.8.14.2 As specified in § 63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record (40 CFR Part 63 Subpart ZZZZ § 63.6660(b)).
- 1.8.14.3 You must keep each record readily accessible in hard copy or electronic form onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to § 63.10(b)(1). You can keep the records off-site for the remaining 3 years (40 CFR Part 63 Subpart ZZZZ § 63.6660(c)).
- 1.9 All engines **except CE-04** are subject to the requirements in 40 CFR part 63 Subpart A "General Provisions", as adopted by reference in Colorado Regulation No. 8, Part E, Section I as specified

in 40 CFR Part 63 Subpart ZZZZ § 63.6665. These requirements include, but are not limited to the following:

- 1.9.1 Prohibited activities and circumvention in § 63.4.
- 1.9.2 Operation and maintenance requirements in § 63.6(e)(1).
- 1.9.3 Performance test requirements in § 63.7.
- 1.9.4 Monitoring requirements in § 63.8.
- 1.9.5 Notification requirements in § 63.9.
- 1.9.6 Recordkeeping requirements in § 63.10.
- 1.10 Engine CE-05 and CE-06 must have a stack height of at least 40 feet (dual stack). (Construction Permit 10GA1221 and 10GA1222)
- 1.11 [Federal-Only]: Engines CE-05 and CE-06 are subject to the requirements in 40 CFR Part 60 Subpart JJJJ, "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines", including but not limited to the following requirements:

Note that as of the date of revised permit issuance [March 21, 2012] the requirements in 40 CFR Part 60 Subpart JJJJ have not been adopted into Colorado Regulation No. 8, Part E by the Division and are therefore not state-enforceable. In the event that the Division adopts these requirements, these requirements will become both state and federally enforceable.

Emissions Limitations

1.11.1 These engines must comply with the emission standards in the table. For engines manufactured prior to January 1, 2011 that were certified to the certification emission standards in 40 CFR part 1048 applicable to engines that are not severe duty engines, if such engine was certified to a carbon monoxide (CO) standard above the standard in table below, then the engine may meet the CO certification (not field testing) standard for which the engine was certified. (§ 60.4233(e))

Manufacturer Date: July 1, 2007						
Emiss	sion Standards (g/l	hp-hr)	Emission S	Emission Standards (ppmvd at 15% O ₂)		
NO_X	CO	VOC	NO_X	CO	VOC	
2.0	4.0	1.0	160	540	86	
		Manufacturer D	ate: July 1, 2010			
Emiss	sion Standards (g/l	hp-hr)	Emission S	tandards (ppmvd	at 15% O ₂)	
NO_X	CO	VOC	NO_X	CO	VOC	
1.0	2.0	0.7	82	270	60	

Compliance Requirements

1.11.2 The source shall keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the source must conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance. (§ 60.4243(b)(2)(ii))

> The performance testing required by Condition 1.4 may be used to fulfill the above performance testing requirements provided the tests are conducted in accordance with the requirements in 40 CFR Part 60 Subpart A § 60.8 and Subpart JJJJ § 60.4244 and the engine has not been operated for 8,760 hours or more in the three year period.

> In addition to the above performance tests, the compliance with the NO_x and CO emission limitations shall be monitored by conducting portable monitoring semiannually in accordance with the requirements in Condition 1.4.

Recordkeeping and Reporting Requirements

- 1.11.3 The facility must keep records of the following information:
 - 1.11.3.1 All notifications submitted to comply with this subpart and all documentation supporting any notification. (§ 60.4245(a)(1))
 - 1.11.3.2 Maintenance conducted on the engine. (§ 60.4245(a)(2))
 - 1.11.3.3 If engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to §60.4243(a)(2), documentation that the engine meets the emission standards. (§ 60.4245(a)(4))
- 1.11.4 For engines that have not been certified by an engine manufacturer to meet the emission standards in §60.4231, the source must submit an initial notification as required in §60.7(a)(1). The notification must include the information in paragraphs (c)(1) through (5) of this section. ($\S 60.4245(c)$)
- 1.11.5 The source must submit a copy of each performance test as conducted in §60.4244 within 60 days after the test has been completed. (§ 60.4245(d))
- CE-05 and CE-06 only: An initial performance test shall be conducted within 180 days of the 1.12 modified permit issuance [March 21, 2012] to demonstrate compliance with the monthly and annual NO_X and CO emission limitations in this permit. The test protocol must be in accordance with the requirement of the Air Pollution Control Division Compliance Test Manual and shall be submitted to the Division for review and approval at least thirty (30) calendar days prior to testing. No performance test shall be conducted without prior written approval by the Division. Any compliance test conducted to show compliance with a monthly or annual emission limitation shall have the results projected up to the monthly or annual averaging time by

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multiplying the test results by the allowable number of operating hours for that averaging time. (Colorado Construction Permit 10GA1221 and 10GA1222)

2. DU04: Triethylene Glycol Dehydration unit controlled with condenser and Vapor Recovery Unit (VRU)

Parameter	Permit	Limit	ations	Compliance Emission Factor	Monitor	ing
	Condition Number	Short Term	Long Term		Method	Interval
VOC Emissions	2.1	1,784 lbs/mo	10.5 tons/yr	Based on GRI GlyCalc Model, Version 4.0 or Higher	Parametric	Daily & Weekly
Extended Gas Analysis					EPA Reference Methods	Quarterly
Gas Processed	2.2	4,650 MMscf/mo	54,750 MMscf/year		Recordkeeping	Monthly
Hours of Operation	2.3				Recordkeeping	Monthly
Opacity	2.4		20% except as condition 2.4			
VRU Control System	2.5	95% reduct	ion of VOC		Recordkeeping	Daily
Condenser Outlet Temperature	2.6	< 17	0 °F		Recordkeeping	Daily
MACT HH	2.7	< 1984lbs ber	nzene per year		See Conditi	on 2.7

- 2.1 Emissions of air pollutants shall not exceed the limitations listed in the Summary Table 2 above. Compliance with the annual limits shall be determined on a rolling 12-month total. By the end of each month a new twelve month total is calculated based on the previous twelve months data. The short term emission limits are only applicable for the first twelve months of operation. Monthly records of the actual emissions shall be maintained by the applicant and made available to the Division for inspection upon request. (Construction Permit 10GA1223, as modified under the provisions of Section I, Condition 1.3).
 - 2.1.1 Emissions of VOC and HAPs will be calculated monthly using the Gas Research Institute's GLYCalc (Version 4.0 or higher) Model. Parametric monitoring of the triethylene glycol circulation rate, condenser outlet temperature, inlet gas pressure and temperature, and flash tank temperature and pressure will be performed to verify input to this model. Values recorded shall be representative of how the unit operated during the period. Recording interval for all parameters, except the condenser outlet temperature and lean glycol circulation rate, will be on a weekly basis. The condenser outlet temperature and lean glycol circulation rate shall be recorded manually or automatically on a daily basis. Monthly calculation of uncontrolled emissions using GLYCalc will be conducted by the end of the subsequent month utilizing the gas data from the last analysis conducted as required by Condition 2.1.2 and the average value of the monitored parameters. Emissions of VOC shall be calculated from the GLYCalc results as follows:

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- 2.1.1.1 The maximum pumping rate of lean glycol shall not exceed 12 gallons per minute (a pump stroke correlation can be used).
- 2.1.2 Samples of inlet gas shall be collected and analyzed (extended gas analysis) to determine C₁ to C₆, n-hexane, benzene, toluene, ethyl benzene and total xylene (BTEX) composition once per calendar quarter. Frequency of extended gas analyses shall move to semi-annually (calendar semi-annual period) after the first year, then to annually (calendar year) after the second year if BTEX concentrations remain consistently below the established values as identified in the table below (from the GRI-GLYCalc 4.0 analysis dated September 24, 2010).

Component	Value	Criteria
Benzene Content of Gas	66.9 ppm	At or Below
Toluene Content of Gas	89.9 ppm	At or Below
Ethyl Benzene Content of Gas	3.0 ppm	At or Below
Xylene Content of Gas	40.9 ppm	At or Below
Total BTEX	200.7 ppm	At or Below

Once an annual frequency has been established, if any gas analysis results show that two of the constituent concentrations exceed the values listed in the above table, the frequency of analysis shall revert to semi-annually. If any gas analysis results show that three of the constituents or the total BTEX concentration exceeds the values listed in the above table, frequency of analysis shall revert to quarterly. Frequency of sampling and analysis will move to annually after two (2) subsequent semi-annual analyses or four (4) subsequent quarterly analyses indicate that the total BTEX and concentration of all constituents remain at or below the values in the above table.

- 2.2 Processing of natural gas shall not exceed 54,750 MMscf per year. (Construction Permit 10GA1223, as modified under the provisions of Section I, Condition 1.3). The short term natural gas throughput limits are only applicable for the first twelve months of operation.
 - The gas throughput to the dehydration units shall be recorded monthly using existing flow meters. A twelve-month rolling total will be maintained to monitor compliance with annual throughput limitations. An average daily gas throughput rate shall be determined by dividing the monthly gas throughput by the number of operating days in the previous month. This average daily gas throughput rate shall be used in any required GlyCalc runs.
- 2.3 The Hours/Days of Operation shall be monitored monthly and recorded and maintained to be made available to the Division upon request. The days of operation shall be used to calculate an average daily gas throughput to be used in the GLYCalc model runs as required by Condition 2.1.

- 2.4 Visible emission shall not exceed 20% opacity (Colorado Regulation No. 1, Section II.A.1) except during periods of startup, process modification, or adjustment of control equipment during which visible emissions shall not exceed 30% opacity for more than six minutes in any sixty consecutive minutes (Colorado Regulation No. 1, Section II.A.4).
- 2.5 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, which is in excess of 30% opacity for a period or periods aggregating more than six (6) minutes in any sixty (60) consecutive minutes (Colorado Regulation No. 1, Section II.A.4).
- 2.6 This emissions unit is designed with a control system, which shall be capable of reducing the emissions of volatile organic compounds by at least 95% on a monthly-average basis (Construction Permit 10GA1223). The total monthly run time of the dehydration unit and that of the VRU shall be monitored and recorded and used to calculate emissions as required by Condition 2.1.
- 2.7 The condenser outlet temperature shall be monitored on a daily basis. The condenser outlet temperature shall not exceed 170 °F on a monthly average basis.
- 2.8 The glycol dehydration units are subject to the requirements in 40 CFR Part 63 Subpart HH, "National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities", as adopted by reference in Colorado Regulation No. 8, Part E, Section III, including, but not limited to the following:
 - 2.8.1 These dehydrators are exempt from all requirements, save recordkeeping in §63.774(d)(1), provided the criterion in Condition 2.8.1.1 below is met: (§63.764(e)(1))
 - 2.8.1.1 The actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere shall be less than 0.90 megagram per year, or 1984 lbs per year, as determined by the procedures specified in Condition 3.7.3 (§63.764 (e)(1)(ii)).
 - 2.8.2 Records shall be kept of the actual average benzene emissions (in terms of benzene emissions per year) as determined in accordance with Condition 2.8.3 §63.772(b)(2) (§63.774(d)(1)(ii)).
 - 2.8.3 The determination of actual average benzene emissions from this glycol dehydration unit shall be made using the procedure described in Condition 2.8.3.1 below. Emissions shall be determined with federally enforceable controls in place.
 - 2.8.3.1 The actual average benzene emissions shall be determined using the model GRI-GLYCalc, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc, Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research

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Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI–95/0368.1) (Colorado Construction Permit 06GA0062 and §63.772(b)(2)(i)).

3. S008 – Four 300-bbl and Two 500-bbl Condensate Tanks with Vapor Recovery Unit (VRU);

Parameter	Permit	Limitations	Compliance Emission	Monito	ring
	Condition Number		Factor	Method	Interval
VOC Emissions	3.1	27.2 ton/yr	API E & P Tanks Version 2.0 or Higher	Calculation	Monthly
E & P Tanks Input Parameters	3.2			Recordkeeping and Analysis	Monthly, annually
Condensate Produced	3.3	73,000 bbls/yr		Recordkeeping	Monthly
Sales Condensate Analysis	3.4			Analytical Methods	Monthly
Opacity	3.5 3.6	Not to exceed 20% except as provided in Condition 3.6			
VRU Control System	3.7	95% reduction of VOC		Recordkeeping	Daily

3.1 VOC emissions from the tank battery shall not exceed the above limitations (Construction Permit 04GA0026, as modified under the provisions of Section I, Condition 1.3). Monthly uncontrolled emissions shall be calculated using API's E & P Tanks Version 2.0 or higher. Emissions for each month shall be calculated using the input parameters specified in Condition 3.2, the monthly quantity of condensate sold and the sales oil properties as determined by Condition 3.4. The results of the E&P Tanks model should be used to calculate emissions as follows:

Monthly emissions shall be used in a rolling twelve-month total to monitor compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months' data.

- 3.2 The input parameters to E & P Tanks shall be monitored as follows:
 - 3.2.1 The separator temperature and pressure shall be monitored and recorded monthly. Monthly values shall be representative of the unit's operation during the month. The recorded values for separator temperature and pressure shall be used to calculate emissions as required by Condition 3.1.
 - 3.2.2 For purposes of calculating emissions as required by Condition 3.1, the permittee shall use the historical monthly mean temperature recorded at Grand Junction.

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- 3.2.3 The permittee shall sample and analyze liquids annually for the compositional E&P Tanks input requirements. The 'low pressure oil' condensate sample must be collected and analyzed per Division approved methods. The stream shall be sampled prior to flashing. Sampling must occur when the systems are operating such that any xylene and/or methanol injections that occur upstream of the facility are captured by the sampling. A copy of the procedures used to obtain and analyze the samples as well as records of the analyses shall be maintained and made available to the Division upon request.
- 3.3 The quantity of condensate processed through the tank battery shall not exceed the above limitations (Construction Permit 04GA0026, as modified under the provisions of Section I, Condition 1.3). The quantity of condensate processed through the tank battery shall be monitored and recorded monthly and used to calculate emissions as required by Condition 3.1. The monthly quantity of condensate processed shall be used in a twelve month rolling total to monitor compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months' data.
- 3.4 The sales condensate shall be analyzed as follows:
 - 3.4.1 The sales condensate shall be sampled and analyzed annually to determine the reid vapor pressure (RVP). A copy of the procedures used to obtain and analyze samples shall be maintained and made available to the Division upon request. The RVP determined by the analysis shall be used to calculate emissions as required by Condition 3.1.
 - 3.4.2 Records of the actual API gravity from one representative sales receipt each month shall be retained and made available to the Division upon request. The API gravity from this monthly sales receipt shall be used to calculate emissions as required by Condition 3.1. In the event that a sale is not made in a given month, the API gravity from the previous month shall be used to calculate monthly emissions.
- 3.5 Except as provided in Condition 3.6 below, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity. (Colorado Regulation No. 1, II.A.1).
- 3.6 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, which is in excess of 30% opacity for a period or periods aggregating more than six (6) minutes in any sixty (60) consecutive minutes (Colorado Regulation No. 1, Section II.A.4).
 - A record shall be kept of the type, date and time of the commencement and completion of each and every condition subject to Regulation No. 1, Section II.A.4 that results in an exceedance. The records shall be made available for review upon request by the Division.
- 3.7 This emissions unit is designed with a control system, which shall be capable of reducing the emissions of volatile organic compounds by at least 95% on a monthly-average basis

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(Construction Permit 04GA0026, as modified under the provisions of Section I, Condition 1.3).. The total monthly run time of the condensate tanks and that of the VRU shall be monitored and recorded and used to calculate emissions as required by Condition 3.1.

3.7.1 **[State-Only]** A record shall be maintained of the date, time and duration of any period where the VRU is not operating. The duration of a period of non-operation shall be from the time that the VRU was last observed to be operating until the time the equipment recommences operation. Records shall be kept for five years and made available for Division inspection upon request. (Colorado Regulation No. 7, Section XVII.C.4.b)

4. S009 -Fugitive Emissions of VOCs from Equipment Leaks;

Parameter	Permit	Compliance Limits	Compliance	Monito	oring
	Condition Number		Emission Factor	Method	Interval
VOC	4.1	21.6 tons per year	By Component- EPA Protocol for Equipment Leak Estimates	Initial Component Count, Recordkeeping, and Emission Calculations	See Condition 4.1.2
Gas Analysis				EPA/Division Approved Methods	Annually

4.1 VOC emissions shall not exceed the limitations stated. Emissions shall be calculated using the emission factors and equations listed below. The records shall be kept at the site or a local field office and made available for Division review upon request.

Emission Factors for individual types of components in lbs/component-hr from the reference <u>Protocol for Equipment Leak Emission Estimates</u>, <u>EPA</u>, <u>November 1995</u>, <u>EPA-453/R-95-017</u>. These emission factors are fixed until changed by established permit modification procedures.

Component		Emission Facto	ors (lb/component-h	r)
	Gas	Light Liquid	Light Oil/Water	Heavy Liquid
Valves	9.92×10^{-3}	5.51×10^{-3}	2.16×10^{-4}	1.85×10^{-5}
Connectors	4.41×10^{-4}	4.63×10^{-4}	2.43×10^{-4}	1.65×10^{-5}
Flanges	8.60×10^{-4}	2.43×10^{-4}		8.60×10^{-7}
Pump Seals	5.29×10^{-3}	2.87×10^{-2}		
Open-Ended Lines	4.41×10^{-3}	3.09×10^{-3}		3.09×10^{-4}
Other*	1.94×10^{-2}	1.65×10^{-2}	3.09×10^{-2}	

^{*}Other equipment type includes compressors, pressure relief valves, relief valves, diaphragms, drains, dump arms, hatches, instrument meters, polish rods, and vents.

Calculation of annual emissions of VOC per component:

(Component count) X (8760 hrs/year) X (Weight %VOC) X (Emission factor for component being evaluated) X (Control Factor)

The total fugitive VOC emissions shall be the sum of emissions for each component

- 4.1.1 The most recent gas analysis as required under Condition 2.1 of this Permit shall be used to determine the appropriate weight %VOC to use in the above equation.
- 4.1.2 The annual emissions limitations in Condition 4.1 are based on the equipment configuration as listed in the table below. A component count shall be conducted within

one year of issuance of this permit to verify existing hardware inventory. Records shall be kept of all component additions and deletions, and a running tally maintained. A physical hard-count of facility components shall be conducted every five years following the initial count required under this condition.

Component		Compo	onent Count	
	Gas	Light Liquids	Light Oil/Water	Heavy Liquid
Valves	1038	210	7	163
Connectors	3717	1479	106	1197
Flanges	694	40		3
Pump Seals	34	7		
Open-Ended Lines	224	3		11
Other*	85	6	4	
VOC Content (wt%)	11.53	100	100	100

5. S010 – Condensate Truck Loading;

Parameter	Permit	Lim	itations	Compliance	Monito	oring
	Condition Number	Short Term	Long Term	Emission Factor	Method	Interval
VOC Emissions	5.1		5.6 tons/yr	3.62 pounds per 1000 gallons loaded	Recordkeeping and Calculation	Monthly
Condensate Loaded	5.2		3,066,000 gal/yr		Recordkeeping	For Each Truck Loading Activity

5.1 Volatile Organic Compound (VOC) emissions from condensate truck loading shall not exceed the limitations stated above (Construction Permit 03GA0763 as modified under the provisions of Section II, condition 1.3). VOC emissions shall be calculated monthly using the Compliance Emission Factor.

Monthly emissions of VOC will be used in a rolling twelve month total to monitor compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months' data.

5.2 The quantity of condensate loaded into trucks shall not exceed the limitations stated above (Construction Permit 03GA0763 as modified under the provisions of Section II, condition 1.3). The quantity of condensate loaded into trucks shall be monitored and recorded for each truck loading event and used to calculate emissions as required by Condition 5.1.

Monthly condensate loadout will be used in a rolling twelve month total to monitor compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months' data.

6. Facility Wide

6.1 This facility shall preclude public access through the use of a perimeter fence (Colorado Construction Permits 10GA1221 and 10GA1222, as modified under the provisions of Section I, Condition 1.3).

SECTION III - Permit Shield

Regulation No. 3, 5 CCR 1001-5, Part C, §§ I.A.4, V.D. & XIII.B; § 25-7-114.4(3)(a), C.R.S.

Specific Non-Applicable Requirements 1.

Based on the information available to the Division and supplied by the applicant, the following parameters and requirements have been specifically identified as non-applicable to the facility to which this permit has been issued. This shield does not protect the source from any violations that occurred prior to or at the time of permit issuance. In addition, this shield does not protect the source from any violations that occur as a result of any modifications or reconstruction on which construction commenced prior to permit issuance.

Emission unit	Applicable Requirement	Justification
Facility	40 CFR 60, Subpart KKK, Standards of	There is not existing natural gas liquid extraction unit
	Performance for Equipment Leaks of VOC	located at the Hunter Mesa facility. Any liquids
	From Onshore Natural Gas Processing Plants	recovered onsite are done through gravimetric
	(Colorado Regulation No. 6, Part A, Subpart	separation processes typical of inlet gas separation
	KKK)	implemented at most compressor stations.

General Conditions 2.

Compliance with this Operating Permit shall be deemed compliance with all applicable requirements specifically identified in the permit and other requirements specifically identified in the permit as not applicable to the source. This permit shield shall not alter or affect the following:

- The provisions of §§ 25-7-112 and 25-7-113, C.R.S., or § 303 of the federal act, concerning 2.1 enforcement in cases of emergency;
- 2.2 The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- 2.3 The applicable requirements of the federal Acid Rain Program, consistent with § 408(a) of the federal act:
- 2.4 The ability of the Air Pollution Control Division to obtain information from a source pursuant to § 25-7-111(2)(I), C.R.S., or the ability of the Administrator to obtain information pursuant to § 114 of the federal act;
- 2.5 The ability of the Air Pollution Control Division to reopen the Operating Permit for cause pursuant to Regulation No. 3, Part C, § XIII.
- 2.6 Sources are not shielded from terms and conditions that become applicable to the source subsequent to permit issuance.

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3. Stream-lined Conditions

The following applicable requirements have been subsumed within this operating permit using the pertinent streamlining procedures approved by the U.S. EPA. For purposes of the permit shield, compliance with the listed permit conditions will also serve as a compliance demonstration for purposes of the associated subsumed requirements.

Permit Condition	Streamlined (Subsumed) Requirements
Section II, Condition 2.6	Regulation No. 7, Section XVII.D [Reduce emissions by 90%] - State-only Requirement
Section II, Condition 3.7	Regulation No. 7, Section XVII.C.1 [Reduce emissions by 95%] - State-only Requirement

SECTION IV - General Permit Conditions (ver 11/16/2010)

1. Administrative Changes

Regulation No. 3, 5 CCR 1001-5, Part A, § III.

The permittee shall submit an application for an administrative permit amendment to the Division for those permit changes that are described in Regulation No. 3, Part A, § I.B.1. The permittee may immediately make the change upon submission of the application to the Division.

2. **Certification Requirements**

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.9., V.C.16.a.& e. and V.C.17.

- Any application, report, document and compliance certification submitted to the Air Pollution Control Division pursuant to Regulation No. 3 or the Operating Permit shall contain a certification by a responsible official of the truth, accuracy and completeness of such form, report or certification stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- All compliance certifications for terms and conditions in the Operating Permit shall be submitted to the Air Pollution b. Control Division at least annually unless a more frequent period is specified in the applicable requirement or by the Division in the Operating Permit.
- Compliance certifications shall contain: c.
 - (i) the identification of each permit term and condition that is the basis of the certification;
 - (ii) the compliance status of the source;
 - whether compliance was continuous or intermittent; (iii)
 - method(s) used for determining the compliance status of the source, currently and over the reporting (iv) period; and
 - (v) such other facts as the Air Pollution Control Division may require to determine the compliance status of the source.
- All compliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental d. Protection Agency at the addresses listed in Appendix D of this Permit.
- If the permittee is required to develop and register a risk management plan pursuant to § 112(r) of the federal act, the e. permittee shall certify its compliance with that requirement; the Operating Permit shall not incorporate the contents of the risk management plan as a permit term or condition.

3. **Common Provisions**

Common Provisions Regulation, 5 CCR 1001-2 §§ II.A., II.B., II.C., II.E., II.F., II.I, and II.J

a. To Control Emissions Leaving Colorado

> When emissions generated from sources in Colorado cross the State boundary line, such emissions shall not cause the air quality standards of the receiving State to be exceeded, provided reciprocal action is taken by the receiving State.

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b. **Emission Monitoring Requirements**

> The Division may require owners or operators of stationary air pollution sources to install, maintain, and use instrumentation to monitor and record emission data as a basis for periodic reports to the Division.

c. Performance Testing

> The owner or operator of any air pollution source shall, upon request of the Division, conduct performance test(s) and furnish the Division a written report of the results of such test(s) in order to determine compliance with applicable emission control regulations.

Performance test(s) shall be conducted and the data reduced in accordance with the applicable reference test methods unless the Division:

- (i) specifies or approves, in specific cases, the use of a test method with minor changes in methodology;
- (ii) approves the use of an equivalent method;
- (iii) approves the use of an alternative method the results of which the Division has determined to be adequate for indicating where a specific source is in compliance; or
- waives the requirement for performance test(s) because the owner or operator of a source has demonstrated (iv) by other means to the Division's satisfaction that the affected facility is in compliance with the standard. Nothing in this paragraph shall be construed to abrogate the Commission's or Division's authority to require testing under the Colorado Revised Statutes, Title 25, Article 7, and pursuant to regulations promulgated by the Commission.

Compliance test(s) shall be conducted under such conditions as the Division shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Division such records as may be necessary to determine the conditions of the performance test(s). Operations during period of startup, shutdown, and malfunction shall not constitute representative conditions of performance test(s) unless otherwise specified in the applicable standard.

The owner or operator of an affected facility shall provide the Division thirty days prior notice of the performance test to afford the Division the opportunity to have an observer present. The Division may waive the thirty day notice requirement provided that arrangements satisfactory to the Division are made for earlier testing.

The owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows:

- (i) Sampling ports adequate for test methods applicable to such facility;
- (ii) Safe sampling platform(s);
- (iii) Safe access to sampling platform(s); and
- Utilities for sampling and testing equipment. (iv)

Each performance test shall consist of at least three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic mean of results of at least three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the owner or operator's control, compliance may, upon the Division's approval, be determined using the arithmetic mean of the results of the two other runs.

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d. Affirmative Defense Provision for Excess Emissions during Malfunctions

> Note that until such time as the U.S. EPA approves this provision into the Colorado State Implementation Plan (SIP), it shall be enforceable only by the State.

An affirmative defense to a claim of violation under these regulations is provided to owners and operators for civil penalty actions for excess emissions during periods of malfunction. To establish the affirmative defense and to be relieved of a civil penalty in any action to enforce an applicable requirement, the owner or operator of the facility must meet the notification requirements below in a timely manner and prove by a preponderance of evidence that:

- (i) The excess emissions were caused by a sudden, unavoidable breakdown of equipment, or a sudden, unavoidable failure of a process to operate in the normal or usual manner, beyond the reasonable control of the owner or operator;
- (ii) The excess emissions did not stem from any activity or event that could have reasonably been foreseen and avoided, or planned for, and could not have been avoided by better operation and maintenance practices;
- (iii) Repairs were made as expeditiously as possible when the applicable emission limitations were being exceeded;
- (iv) The amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent practicable during periods of such emissions;
- (v) All reasonably possible steps were taken to minimize the impact of the excess emissions on ambient air quality;
- All emissions monitoring systems were kept in operation (if at all possible); (vi)
- (vii) The owner or operator's actions during the period of excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence;
- (viii) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance:
- (ix) At all times, the facility was operated in a manner consistent with good practices for minimizing emissions. This section is intended solely to be a factor in determining whether an affirmative defense is available to an owner or operator, and shall not constitute an additional applicable requirement; and
- During the period of excess emissions, there were no exceedances of the relevant ambient air quality (x) standards established in the Commissions' Regulations that could be attributed to the emitting source.

The owner or operator of the facility experiencing excess emissions during a malfunction shall notify the division verbally as soon as possible, but no later than noon of the Division's next working day, and shall submit written notification following the initial occurrence of the excess emissions by the end of the source's next reporting period. The notification shall address the criteria set forth above.

The Affirmative Defense Provision contained in this section shall not be available to claims for injunctive relief.

The Affirmative Defense Provision does not apply to failures to meet federally promulgated performance standards or emission limits, including, but not limited to, new source performance standards and national emission standards for hazardous air pollutants. The affirmative defense provision does not apply to state implementation plan (sip) limits or permit limits that have been set taking into account potential emissions during malfunctions, including, but not necessarily limited to, certain limits with 30-day or longer averaging times, limits that indicate they apply during malfunctions, and limits that indicate they apply at all times or without exception.

e. Circumvention Clause

A person shall not build, erect, install, or use any article, machine, equipment, condition, or any contrivance, the use of which, without resulting in a reduction in the total release of air pollutants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of this regulation. No person shall circumvent this regulation by using more openings than is considered normal practice by the industry or activity in question.

f. Compliance Certifications

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in the Colorado State Implementation Plan, nothing in the Colorado State Implementation Plan shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. Evidence that has the effect of making any relevant standard or permit term more stringent shall not be credible for proving a violation of the standard or permit term.

When compliance or non-compliance is demonstrated by a test or procedure provided by permit or other applicable requirement, the owner or operator shall be presumed to be in compliance or non-compliance unless other relevant credible evidence overcomes that presumption.

g. Affirmative Defense Provision for Excess Emissions During Startup and Shutdown

An affirmative defense is provided to owners and operators for civil penalty actions for excess emissions during periods of startup and shutdown. To establish the affirmative defense and to be relieved of a civil penalty in any action to enforce an applicable requirement, the owner or operator of the facility must meet the notification requirements below in a timely manner and prove by a preponderance of the evidence that:

- (i) The periods of excess emissions that occurred during startup and shutdown were short and infrequent and could not have been prevented through careful planning and design;
- (ii) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation or maintenance:
- (iii) If the excess emissions were caused by a bypass (an intentional diversion of control equipment), then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
- (iv) The frequency and duration of operation in startup and shutdown periods were minimized to the maximum extent practicable;
- (v) All possible steps were taken to minimize the impact of excess emissions on ambient air quality;
- (vi) All emissions monitoring systems were kept in operation (if at all possible);
- (vii) The owner or operator's actions during the period of excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence; and,
- (viii) At all times, the facility was operated in a manner consistent with good practices for minimizing emissions. This subparagraph is intended solely to be a factor in determining whether an affirmative defense is available to an owner or operator, and shall not constitute an additional applicable requirement.

The owner or operator of the facility experiencing excess emissions during startup and shutdown shall notify the Division verbally as soon as possible, but no later than two (2) hours after the start of the next working day, and shall submit written quarterly notification following the initial occurrence of the excess emissions. The notification shall address the criteria set forth above.

The Affirmative Defense Provision contained in this section shall not be available to claims for injunctive relief.

The Affirmative Defense Provision does not apply to State Implementation Plan provisions or other requirements that derive from new source performance standards or national emissions standards for hazardous air pollutants, or any other federally enforceable performance standard or emission limit with an averaging time greater than twenty-four hours. In addition, an affirmative defense cannot be used by a single source or small group of sources where the excess emissions have the potential to cause an exceedance of the ambient air quality standards or Prevention of Significant Deterioration (PSD) increments.

In making any determination whether a source established an affirmative defense, the Division shall consider the information within the notification required above and any other information the Division deems necessary, which may include, but is not limited to, physical inspection of the facility and review of documentation pertaining to the maintenance and operation of process and air pollution control equipment.

4. Compliance Requirements

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.C.9., V.C.11. & 16.d. and § 25-7-122.1(2), C.R.S.

- a. The permittee must comply with all conditions of the Operating Permit. Any permit noncompliance relating to federally-enforceable terms or conditions constitutes a violation of the federal act, as well as the state act and Regulation No. 3. Any permit noncompliance relating to state-only terms or conditions constitutes a violation of the state act and Regulation No. 3, shall be enforceable pursuant to state law, and shall not be enforceable by citizens under § 304 of the federal act. Any such violation of the federal act, the state act or regulations implementing either statute is grounds for enforcement action, for permit termination, revocation and reissuance or modification or for denial of a permit renewal application.
- b. It shall not be a defense for a permittee in an enforcement action or a consideration in favor of a permittee in a permit termination, revocation or modification action or action denying a permit renewal application that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.
- c. The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of any request by the permittee for a permit modification, revocation and reissuance, or termination, or any notification of planned changes or anticipated noncompliance does not stay any permit condition, except as provided in §§ X. and XI. of Regulation No. 3, Part C.
- d. The permittee shall furnish to the Air Pollution Control Division, within a reasonable time as specified by the Division, any information that the Division may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Division copies of records required to be kept by the permittee, including information claimed to be confidential. Any information subject to a claim of confidentiality shall be specifically identified and submitted separately from information not subject to the claim.
- e. Any schedule for compliance for applicable requirements with which the source is not in compliance at the time of permit issuance shall be supplemental, and shall not sanction noncompliance with, the applicable requirements on which it is based.
- f. For any compliance schedule for applicable requirements with which the source is not in compliance at the time of permit issuance, the permittee shall submit, at least every 6 months unless a more frequent period is specified in the applicable requirement or by the Air Pollution Control Division, progress reports which contain the following:
 - (i) dates for achieving the activities, milestones, or compliance required in the schedule for compliance, and dates when such activities, milestones, or compliance were achieved; and
 - (ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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The permittee shall not knowingly falsify, tamper with, or render inaccurate any monitoring device or method g. required to be maintained or followed under the terms and conditions of the Operating Permit.

5. **Emergency Provisions**

Regulation No. 3, 5 CCR 1001-5, Part C, § VII.E

An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of god, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed the technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. "Emergency" does not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. An emergency constitutes an affirmative defense to an enforcement action brought for noncompliance with a technology-based emission limitation if the permittee demonstrates, through properly signed, contemporaneous operating logs, or other relevant evidence

- an emergency occurred and that the permittee can identify the cause(s) of the emergency; a.
- b. the permitted facility was at the time being properly operated;
- c. during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- d. the permittee submitted oral notice of the emergency to the Air Pollution Control Division no later than noon of the next working day following the emergency, and followed by written notice within one month of the time when emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

This emergency provision is in addition to any emergency or malfunction provision contained in any applicable requirement.

6. **Emission Controls for Asbestos**

Regulation No. 8, 5 CCR 1001-10, Part B

The permittee shall not conduct any asbestos abatement activities except in accordance with the provisions of Regulation No. 8. Part B. "asbestos control."

7. **Emissions Trading, Marketable Permits, Economic Incentives**

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.13.

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are specifically provided for in the permit.

8. **Fee Payment**

C.R.S §§ 25-7-114.1(6) and 25-7-114.7

- The permittee shall pay an annual emissions fee in accordance with the provisions of C.R.S. § 25-7-114.7. A 1% a. per month late payment fee shall be assessed against any invoice amounts not paid in full on the 91st day after the date of invoice, unless a permittee has filed a timely protest to the invoice amount.
- The permittee shall pay a permit processing fee in accordance with the provisions of C.R.S. § 25-7-114.7. If the b. Division estimates that processing of the permit will take more than 30 hours, it will notify the permittee of its estimate of what the actual charges may be prior to commencing any work exceeding the 30 hour limit.

Issued: September 1, 2009

Operating Permit 12OPGA363 Last Revised: March 21, 2012 The permittee shall pay an APEN fee in accordance with the provisions of C.R.S. § 25-7-114.1(6) for each APEN or revised APEN filed.

9. **Fugitive Particulate Emissions**

Regulation No. 1, 5 CCR 1001-3, § III.D.1.

The permittee shall employ such control measures and operating procedures as are necessary to minimize fugitive particulate emissions into the atmosphere, in accordance with the provisions of Regulation No. 1, § III.D.1.

10. **Inspection and Entry**

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.16.b.

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Air Pollution Control Division, or any authorized representative, to perform the following:

- enter upon the permittee's premises where an Operating Permit source is located, or emissions-related activity is a. conducted, or where records must be kept under the terms of the permit;
- have access to, and copy, at reasonable times, any records that must be kept under the conditions of the permit; b.
- inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), c. practices, or operations regulated or required under the Operating Permit;
- d. sample or monitor at reasonable times, for the purposes of assuring compliance with the Operating Permit or applicable requirements, any substances or parameters.

Minor Permit Modifications 11.

Regulation No. 3, 5 CCR 1001-5, Part C, §§ X. & XI.

The permittee shall submit an application for a minor permit modification before making the change requested in the application. The permit shield shall not extend to minor permit modifications.

12. **New Source Review**

Regulation No. 3, 5 CCR 1001-5, Part B

The permittee shall not commence construction or modification of a source required to be reviewed under the New Source Review provisions of Regulation No. 3, Part B, without first receiving a construction permit.

13. No Property Rights Conveyed

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.11.d.

This permit does not convey any property rights of any sort, or any exclusive privilege.

14. Odor

Regulation No. 2, 5 CCR 1001-4, Part A

As a matter of state law only, the permittee shall comply with the provisions of Regulation No. 2 concerning odorous emissions.

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15. Off-Permit Changes to the Source

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.B.

The permittee shall record any off-permit change to the source that causes the emissions of a regulated pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from the change, including any other data necessary to show compliance with applicable ambient air quality standards. The permittee shall provide contemporaneous notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit. The permit shield shall not apply to any off-permit change.

16. Opacity

Regulation No. 1, 5 CCR 1001-3, §§ I., II.

The permittee shall comply with the opacity emissions limitation set forth in Regulation No. 1, §§ I.- II.

17. Open Burning

Regulation No. 9, 5 CCR 1001-11

The permittee shall obtain a permit from the Division for any regulated open burning activities in accordance with provisions of Regulation No. 9.

18. Ozone Depleting Compounds

Regulation No. 15, 5 CCR 1001-17

The permittee shall comply with the provisions of Regulation No. 15 concerning emissions of ozone depleting compounds. Sections I., II.C., II.D., III. IV., and V. of Regulation No. 15 shall be enforced as a matter of state law only.

19. Permit Expiration and Renewal

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.6., IV.C., V.C.2.

- a. The permit term shall be five (5) years. The permit shall expire at the end of its term. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted.
- b. Applications for renewal shall be submitted at least twelve months, but not more than 18 months, prior to the expiration of the Operating Permit. An application for permit renewal may address only those portions of the permit that require revision, supplementing, or deletion, incorporating the remaining permit terms by reference from the previous permit. A copy of any materials incorporated by reference must be included with the application.

20. Portable Sources

Regulation No. 3, 5 CCR 1001-5, Part C, § II.D.

Portable Source permittees shall notify the Air Pollution Control Division at least 10 days in advance of each change in location.

21. Prompt Deviation Reporting

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.7.b.

The permittee shall promptly report any deviation from permit requirements, including those attributable to malfunction conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken.

"Prompt" is defined as follows:

- a. Any definition of "prompt" or a specific timeframe for reporting deviations provided in an underlying applicable requirement as identified in this permit; or
- b. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:
 - (i) For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report shall be made within 24 hours of the occurrence;
 - (ii) For emissions of any regulated air pollutant, excluding a hazardous air pollutant or a toxic air pollutant that continue for more than two hours in excess of permit requirements, the report shall be made within 48 hours; and
 - (iii) For all other deviations from permit requirements, the report shall be submitted every six (6) months, except as otherwise specified by the Division in the permit in accordance with paragraph 22.d. below.
- c. If any of the conditions in paragraphs b.i or b.ii above are met, the source shall notify the Division by telephone (303-692-3155) or facsimile (303-782-0278) based on the timetables listed above. [Explanatory note: Notification by telephone or facsimile must specify that this notification is a deviation report for an Operating Permit.] A written notice, certified consistent with General Condition 2.a. above (Certification Requirements), shall be submitted within 10 working days of the occurrence. All deviations reported under this section shall also be identified in the 6-month report required above.

"Prompt reporting" does not constitute an exception to the requirements of "Emergency Provisions" for the purpose of avoiding enforcement actions.

22. Record Keeping and Reporting Requirements

Regulation No. 3, 5 CCR 1001-5, Part A, § II.; Part C, §§ V.C.6., V.C.7.

- a. Unless otherwise provided in the source specific conditions of this Operating Permit, the permittee shall maintain compliance monitoring records that include the following information:
 - (i) date, place as defined in the Operating Permit, and time of sampling or measurements;
 - (ii) date(s) on which analyses were performed;
 - (iii) the company or entity that performed the analysis;
 - (iv) the analytical techniques or methods used;
 - (v) the results of such analysis; and
 - (vi) the operating conditions at the time of sampling or measurement.
- b. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application. Support information, for this purpose, includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Operating Permit. With prior approval of the Air Pollution Control Division, the permittee may maintain any of the above records in a computerized form.
- c. Permittees must retain records of all required monitoring data and support information for the most recent twelve (12) month period, as well as compliance certifications for the past five (5) years on-site at all times. A permittee shall make available for the Air Pollution Control Division's review all other records of required monitoring data and support information required to be retained by the permittee upon 48 hours advance notice by the Division.

- d. The permittee shall submit to the Air Pollution Control Division all reports of any required monitoring at least every six (6) months, unless an applicable requirement, the compliance assurance monitoring rule, or the Division requires submission on a more frequent basis. All instances of deviations from any permit requirements must be clearly identified in such reports.
- The permittee shall file an Air Pollutant Emissions Notice ("APEN") prior to constructing, modifying, or altering e. any facility, process, activity which constitutes a stationary source from which air pollutants are or are to be emitted, unless such source is exempt from the APEN filing requirements of Regulation No. 3, Part A, § II.D. A revised APEN shall be filed annually whenever a significant change in emissions, as defined in Regulation No. 3, Part A, § II.C.2., occurs; whenever there is a change in owner or operator of any facility, process, or activity; whenever new control equipment is installed; whenever a different type of control equipment replaces an existing type of control equipment; whenever a permit limitation must be modified; or before the APEN expires. An APEN is valid for a period of five years. The five-year period recommences when a revised APEN is received by the Air Pollution Control Division. Revised APENs shall be submitted no later than 30 days before the five-year term expires. Permittees submitting revised APENs to inform the Division of a change in actual emission rates must do so by April 30 of the following year. Where a permit revision is required, the revised APEN must be filed along with a request for permit revision. APENs for changes in control equipment must be submitted before the change occurs. Annual fees are based on the most recent APEN on file with the Division.

23. **Reopenings for Cause**

Regulation No. 3, 5 CCR 1001-5, Part C, § XIII.

- The Air Pollution Control Division shall reopen, revise, and reissue Operating Permits; permit reopenings and reissuance shall be processed using the procedures set forth in Regulation No. 3, Part C, § III., except that proceedings to reopen and reissue permits affect only those parts of the permit for which cause to reopen exists.
- b. The Division shall reopen a permit whenever additional applicable requirements become applicable to a major source with a remaining permit term of three or more years, unless the effective date of the requirements is later than the date on which the permit expires, or unless a general permit is obtained to address the new requirements; whenever additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program; whenever the Division determines the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or whenever the Division determines that the permit must be revised or revoked to assure compliance with an applicable requirement.
- c. The Division shall provide 30 days' advance notice to the permittee of its intent to reopen the permit, except that a shorter notice may be provided in the case of an emergency.
- d. The permit shield shall extend to those parts of the permit that have been changed pursuant to the reopening and reissuance procedure.

24. Section 502(b)(10) Changes

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.A.

The permittee shall provide a minimum 7-day advance notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit. The permittee shall attach a copy of each such notice given to its Operating Permit.

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25. Severability Clause

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.10.

In the event of a challenge to any portion of the permit, all emissions limits, specific and general conditions, monitoring, record keeping and reporting requirements of the permit, except those being challenged, remain valid and enforceable.

26. Significant Permit Modifications

Regulation No. 3, 5 CCR 1001-5, Part C, § III.B.2.

The permittee shall not make a significant modification required to be reviewed under Regulation No. 3, Part B ("Construction Permit" requirements) without first receiving a construction permit. The permittee shall submit a complete Operating Permit application or application for an Operating Permit revision for any new or modified source within twelve months of commencing operation, to the address listed in Item 1 in Appendix D of this permit. If the permittee chooses to use the "Combined Construction/Operating Permit" application procedures of Regulation No. 3, Part C, then the Operating Permit must be received prior to commencing construction of the new or modified source.

27. Special Provisions Concerning the Acid Rain Program

Regulation No. 3, 5 CCR 1001-5, Part C, §§ V.C.1.b. & 8

- a. Where an applicable requirement of the federal act is more stringent than an applicable requirement of regulations promulgated under Title IV of the federal act, 40 Code of Federal Regulations (CFR) Part 72, both provisions shall be incorporated into the permit and shall be federally enforceable.
- b. Emissions exceeding any allowances that the source lawfully holds under Title IV of the federal act or the regulations promulgated thereunder, 40 CFR Part 72, are expressly prohibited.

28. Transfer or Assignment of Ownership

Regulation No. 3, 5 CCR 1001-5, Part C, § II.C.

No transfer or assignment of ownership of the Operating Permit source will be effective unless the prospective owner or operator applies to the Air Pollution Control Division on Division-supplied Administrative Permit Amendment forms, for reissuance of the existing Operating Permit. No administrative permit shall be complete until a written agreement containing a specific date for transfer of permit, responsibility, coverage, and liability between the permittee and the prospective owner or operator has been submitted to the Division.

29. Volatile Organic Compounds

Regulation No. 7, 5 CCR 1001-9, §§ III & V.

The requirements in paragraphs a, b and e apply to sources located in an ozone non-attainment area or the Denver 1-hour ozone attainment/maintenance area. The requirements in paragraphs c and d apply statewide.

a. All storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.

Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. When an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 ppm. Testing shall be conducted as in Regulation No. 7, Section VIII.C.3.

b. Except when otherwise provided by Regulation No. 7, all volatile organic compounds, excluding petroleum liquids, transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be

transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.

- c. The permittee shall not dispose of volatile organic compounds by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized.
- d. No owner or operator of a bulk gasoline terminal, bulk gasoline plant, or gasoline dispensing facility as defined in Colorado Regulation No. 7, Section VI, shall permit gasoline to be intentionally spilled, discarded in sewers, stored in open containers, or disposed of in any other manner that would result in evaporation.
- e. Beer production and associated beer container storage and transfer operations involving volatile organic compounds with a true vapor pressure of less than 1.5 PSIA actual conditions are exempt from the provisions of paragraph b, above.

30. Wood Stoves and Wood burning Appliances

Regulation No. 4, 5 CCR 1001-6

The permittee shall comply with the provisions of Regulation No. 4 concerning the advertisement, sale, installation, and use of wood stoves and wood burning appliances.

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OPERATING PERMIT APPENDICES

- A INSPECTION INFORMATION
- **B-MONITORING AND PERMIT DEVIATION REPORT**
- C COMPLIANCE CERTIFICATION REPORT
- **D-NOTIFICATION ADDRESSES**
- **E-PERMIT ACRONYMS**
- F PERMIT MODIFICATIONS
- G ENGINE APPLICABILITY REPORTS

*DISCLAIMER:

None of the information found in these Appendices shall be considered to be State or Federally enforceable, except as otherwise provided in the permit, and is presented to assist the source, permitting authority, inspectors, and citizens.

APPENDIX A

Inspection Information

Directions to Plant:

From I-70, take exit 90; turn south on Colorado Highway 13, travel 0.16 miles.

Turn east onto CR-346, travel ~ 2.0 miles.

Turn south onto CR-352, travel ~ 1.7 miles.

Veer south onto CR-319 (W. Mamm Creek Road), travel ~ 3.5 miles.

Turn east onto gravel road, travel ~ 0.5 miles.

Veer southeast, travel ~ 0.5 miles.

Turn south, travel ~ 0.7 miles to the compressor station entrance.

Safety Equipment Required:

Eye Protection, Hard Hat, Hearing Protection, steel-toed shoes, and Fire Retardant Clothing.

Facility Plot Plan:

Figure 1 (following page) shows the plot plan as submitted on February 16, 2012.

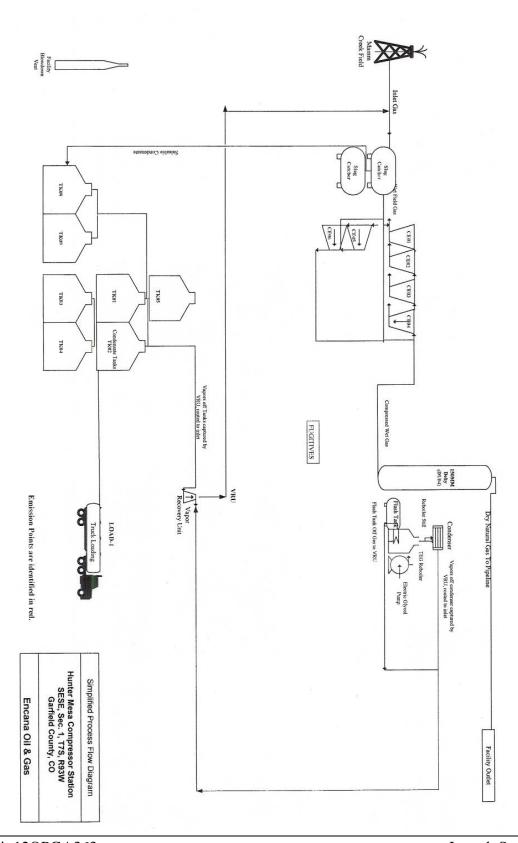
List of Insignificant Activities:

The following list of insignificant activities was provided by the source to assist in the understanding of the facility layout. Since there is no requirement to update such a list, activities may have changed since the last filing. Insignificant activities and/or sources of emissions as submitted in the application are as follows:

- One (1) 210 bbl slop tank
- One (1) 1000 gal Methanol Tank
- One (1) 500 gal Methanol Tank
- One (1) 1000 gal TEG tank
- Nine (9) 500 gal Antifreeze tanks
- Six (6) 1000 gal oil tanks
- One (1) 80 bbl buried slop oil tank
- 0.025 MMBtu/hr fuel gas heater
- One (1) 100 bbl condenser drip tank
- Facility Blowdown stack

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APPENDIX B

Reporting Requirements and Definitions

with codes ver 2/20/07

Please note that, pursuant to 113(c)(2) of the federal Clean Air Act, any person who knowingly:

- (A) makes any false material statement, representation, or certification in, or omits material information from, or knowingly alters, conceals, or fails to file or maintain any notice, application, record, report, plan, or other document required pursuant to the Act to be either filed or maintained (whether with respect to the requirements imposed by the Administrator or by a State);
- (B) fails to notify or report as required under the Act; or
- (C) falsifies, tampers with, renders inaccurate, or fails to install any monitoring device or method required to be maintained or followed under the Act shall, upon conviction, be punished by a fine pursuant to title 18 of the United States Code, or by imprisonment for not more than 2 years, or both. If a conviction of any person under this paragraph is for a violation committed after a first conviction of such person under this paragraph, the maximum punishment shall be doubled with respect to both the fine and imprisonment.

The permittee must comply with all conditions of this operating permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

The Part 70 Operating Permit program requires three types of reports to be filed for all permits. All required reports must be certified by a responsible official.

Report #1: Monitoring Deviation Report (due at least every six months)

For purposes of this operating permit, the Division is requiring that the monitoring reports are due every six months unless otherwise noted in the permit. All instances of deviations from permit monitoring requirements must be clearly identified in such reports.

For purposes of this operating permit, monitoring means any condition determined by observation, by data from any monitoring protocol, or by any other monitoring which is required by the permit as well as the recordkeeping associated with that monitoring. This would include, for example, fuel use or process rate monitoring, fuel analyses, and operational or control device parameter monitoring.

Report #2: Permit Deviation Report (must be reported "promptly")

In addition to the monitoring requirements set forth in the permits as discussed above, each and every requirement of the permit is subject to deviation reporting. The reports must address deviations from permit requirements, including those attributable to malfunctions as defined in this Appendix, the probable cause of

such deviations, and any corrective actions or preventive measures taken. All deviations from any term or condition of the permit are required to be summarized or referenced in the annual compliance certification.

For purposes of this operating permit, "malfunction" shall refer to both emergency conditions and malfunctions. Additional discussion on these conditions is provided later in this Appendix.

For purposes of this operating permit, the Division is requiring that the permit deviation reports are due as set forth in General Condition 21. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. For example, quarterly Excess Emission Reports required by an NSPS or Regulation No. 1, Section IV.

In addition to the monitoring deviations discussed above, included in the meaning of deviation for the purposes of this operating permit are any of the following:

- (1) A situation where emissions exceed an emission limitation or standard contained in the permit;
- (2) A situation where process or control device parameter values demonstrate that an emission limitation or standard contained in the permit has not been met;
- (3) A situation in which observations or data collected demonstrates noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit; or,
- (4) A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only if the emission point is subject to CAM)

For reporting purposes, the Division has combined the Monitoring Deviation Report with the Permit Deviation Report. All deviations shall be reported using the following codes:

1 = Standard: When the requirement is an emission limit or standard When the requirement is a production/process limit 2 = Process:

3 = Monitor: When the requirement is monitoring When the requirement is testing 4 = Test:

When required maintenance is not performed **5** = Maintenance: When the requirement is recordkeeping 6 = Record: When the requirement is reporting 7 =Report:

A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the 8 = CAM:

Compliance Assurance Monitoring (CAM) Rule) has occurred.

When the deviation is not covered by any of the above categories 9 = Other:

Report #3: Compliance Certification (annually, as defined in the permit)

Submission of compliance certifications with terms and conditions in the permit, including emission limitations, standards, or work practices, is required not less than annually.

Operating Permit 12OPGA363 Issued: September 1, 2009 Compliance Certifications are intended to state the compliance status of each requirement of the permit over the certification period. They must be based, at a minimum, on the testing and monitoring methods specified in the permit that were conducted during the relevant time period. In addition, if the owner or operator knows of other material information (i.e. information beyond required monitoring that has been specifically assessed in relation to how the information potentially affects compliance status), that information must be identified and addressed in the compliance certification. The compliance certification must include the following:

- The identification of each term or condition of the permit that is the basis of the certification;
- Whether or not the method(s) used by the owner or operator for determining the compliance status with each permit term and condition during the certification period was the method(s) specified in the permit. Such methods and other means shall include, at a minimum, the methods and means required in the permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Clean Air Act, which prohibits knowingly making a false certification or omitting material information;
- The status of compliance with the terms and conditions of the permit, and whether compliance was continuous or intermittent. The certification shall identify each deviation and take it into account in the compliance certification. Note that not all deviations are considered violations.¹
- Such other facts as the Division may require, consistent with the applicable requirements to which the source is subject, to determine the compliance status of the source.

The Certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only for emission points subject to CAM)

Note the requirement that the certification shall identify each deviation and take it into account in the compliance certification. Previously submitted deviation reports, including the deviation report submitted at the time of the annual certification, may be referenced in the compliance certification.

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¹ For example, given the various emissions limitations and monitoring requirements to which a source may be subject, a deviation from one requirement may not be a deviation under another requirement which recognizes an exception and/or special circumstances relating to that same event.

Startup, Shutdown, Malfunctions and Emergencies,

Understanding the application of Startup, Shutdown, Malfunctions and Emergency Provisions, is very important in both the deviation reports and the annual compliance certifications.

Startup, Shutdown, and Malfunctions

Please note that exceedances of some New Source Performance Standards (NSPS) and Maximum Achievable Control Technology (MACT) standards that occur during Startup, Shutdown or Malfunctions may not be considered to be non-compliance since emission limits or standards often do not apply unless specifically stated in the NSPS. Such exceedances must, however, be reported as excess emissions per the NSPS/MACT rules and would still be noted in the deviation report. In regard to compliance certifications, the permittee should be confident of the information related to those deviations when making compliance determinations since they are subject to Division review. The concepts of Startup, Shutdown and Malfunctions also exist for Best Available Control Technology (BACT) sources, but are not applied in the same fashion as for NSPS and MACT sources.

Emergency Provisions

Under the Emergency provisions of Part 70 certain operational conditions may act as an affirmative defense against enforcement action if they are properly reported.

DEFINITIONS

Malfunction (NSPS) means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

Malfunction (SIP) means any sudden and unavoidable failure of air pollution control equipment or process equipment or unintended failure of a process to operate in a normal or usual manner. Failures that are primarily caused by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

Emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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APPENDIX B: Monitoring and Permit Deviation Report - Part I

- 1. Following is the **required** format for the Monitoring and Permit Deviation report to be submitted to the Division as set forth in General Condition 21. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.
- 2. Part II of this Appendix B shows the format and information the Division will require for describing periods of monitoring and permit deviations, or malfunction or emergency conditions as indicated in the Table below. One Part II Form must be completed for each Deviation. Previously submitted reports (e.g. EER's or malfunctions) may be referenced and the form need not be filled out in its entirety.

FACILITY NAME: Grand River Gathering, LLC.	. – Hunter Mesa Compressor Station
OPERATING PERMIT NO: 120PGA363	
REPORTING PERIOD:	(see first page of the permit for specific reporting period and
dates)	

		Deviation During P		Deviation Code 2	Malfunction Condition During	Reported
Facility ID	Unit Description	YES	NO		YES	NO
CE01	Caterpillar Model G3612 TALE, 4 Cycle low-NO _x Internal Combustion Engine rated at 3506 HP, Natural Gas Fired.					
CE02	Caterpillar Model G3612 TALE, 4 Cycle low-NO _x Internal Combustion Engine rated at 3506 HP, Natural Gas Fired.					
CE03	Caterpillar Model G3612 TALE, 4 Cycle low-NO _x Internal Combustion Engine rated at 3506 HP, Natural Gas Fired.					
CE04	Caterpillar Model G3612 TALE, 4 Cycle low-NO _x Internal Combustion Engine rated at 3506 HP, Natural Gas Fired.					
CE05	Caterpillar Model 3612 TALE, 4 Cycle low-NO _X Internal Combustion Engine rated at 3550 HP, Natural Gas Fired.					
CE06	Caterpillar Model 3616 TALE, 4 Cycle low-NO _X Internal Combustion Engine rated at 4735 HP, Natural Gas Fired					
DU04	Exterran Triethylene Glycol Dehydrator Design Rated at 150 MMscf/day, Equipped with reboiler, flash tank and associated still vent					
TK01-TK04, TK08-TK09	Condensate storage tank battery: Four 300-BBL and Two 500 BBL					
FG01	Fugitive emissions of VOCs from equipment leaks.					
LO01	Condensate truck loadout					
General Conditions						

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		Deviation During P		Deviation Code	Malfunction Condition During	Reported
Facility ID	Unit Description	YES	NO		YES	NO
Insignificant Activities						

¹ See previous discussion regarding what is considered to be a deviation. Determination of whether or not a deviation has occurred shall be based on a reasonable inquiry using readily available information.

1 = Standard: When the requirement is an emission limit or standard 2 = Process: When the requirement is a production/process limit

3 = Monitor: When the requirement is monitoring **4 = Test:** When the requirement is testing

5 = Maintenance: When required maintenance is not performed
 6 = Record: When the requirement is recordkeeping
 7 = Report: When the requirement is reporting

8 = CAM: A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the

Compliance Assurance Monitoring (CAM) Rule) has occurred.

9 = Other: When the deviation is not covered by any of the above categories

² Use the following entries, as appropriate

APPENDIX B: Monitoring and Permit Deviation Report - Part II

OPERATING PERMIT NO: 120PGA363 REPORTING PERIOD:	g, LLC – Hunter Me	sa Compressor Stat	10n
Is the deviation being claimed as an:	Emergency	Malfunction	N/A
(For NSPS/MACT) Did the deviation occur during:	Startup	Shutdown	Malfunction
	Normal Operation		
OPERATING PERMIT UNIT IDENTIFICATION:			
Operating Permit Condition Number Citation			
Explanation of Period of Deviation			
Duration (start/stop date & time)			
Action Taken to Correct the Problem			
Measures Taken to Prevent a Reoccurrence of the Pr	<u>roblem</u>		
Dates of Malfunctions/Emergencies Reported (if app	<u>blicable)</u>		
Deviation Code	Division Code QA:		

EXAMPLE

FACILITY NAME: OPERATING PERMIT NO: REPORTING PERIOD:					
Is the deviation being claimed	d as an:	Emergency	Malfunction _	XX	N/A
(For NSPS/MACT) Did the d	leviation occur during:	Startup Normal Operation	Shutdown		ction
OPERATING PERMIT UNI	T IDENTIFICATION:				
Asphalt Plant with a Scrubbe	r for Particulate Contro	l - Unit XXX			
Operating Permit Condition N	Number Citation				
Section II, Condition 3.1 - Op	pacity Limitation				
Explanation of Period of Dev	riation				
Slurry Line Feed Plugged					
<u>Duration</u>					
START- 1730 4/10/06 END- 1800 4/10/06					
Action Taken to Correct the I	<u>Problem</u>				
Line Blown Out					
Measures Taken to Prevent R	Reoccurrence of the Pro	<u>blem</u>			
Replaced Line Filter					
Dates of Malfunction/Emerge	encies Reported (if appl	<u>licable)</u>			
5/30/06 to A. Einstein, APCI)				
Deviation Code		Division Code QA:			

APPENDIX B: Monitoring and Permit Deviation Report - Part III

REPORT CERTIFICATION

SOURCE NAME: Grand River Gatheri	ing, LLC – Hunter Mesa Compres	SSOI Station
FACILITY IDENTIFICATION NUME	BER: 045-2222	
PERMIT NUMBER: 120PGA363		
REPORTING PERIOD:	(see first page of the permit	for specific reporting period and dates)
	3, Part A, Section I.B.38. This	be certified by a responsible official as signed certification document must be
STATEMENT OF COMPLETENES	SS	
	-	nd, based on information and belief formation contained in this submittal
DI		'll.el'C l. C4'10
1-501(6), C.R.S., makes any false maguilty of a misdemeanor and may be	aterial statement, representation	owingly, as defined in Sub-Section 18- n, or certification in this document is n the provisions of Sub-Section 25-7
1-501(6), C.R.S., makes any false maguilty of a misdemeanor and may be	aterial statement, representation	n, or certification in this document is
1-501(6), C.R.S., makes any false maguilty of a misdemeanor and may be 122.1, C.R.S.	aterial statement, representation be punished in accordance with	n, or certification in this document is n the provisions of Sub-Section 25-7

APPENDIX C

Required Format for Annual Compliance Certification Reports

Following is the format for the Compliance Certification report to be submitted to the Division and the U.S. EPA annually based on the effective date of the permit. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.

FACILITY NAME:	Grand River Gathering, LLC – Hunter Mesa Compressor Station
OPERATING PERMIT NO:	12OPGA363
REPORTING PERIOD:	

I. Facility Status

During the entire reporting period, this source was in compliance with ALL terms and condi	itions contained
in the Permit, each term and condition of which is identified and included by this reference.	The method(s)
used to determine compliance is/are the method(s) specified in the Permit.	

With the possible exception of the deviations identified in the table below, this source was in compliance with all terms and conditions contained in the Permit, each term and condition of which is identified and included by this reference, during the entire reporting period. The method used to determine compliance for each term and condition is the method specified in the Permit, unless otherwise indicated and described in the deviation report(s). Note that not all deviations are considered violations.

Facility ID	Unit Description	Deviations I	Reported ¹	Monitoring Method per Permit? ²		Was compliance continuous or intermittent? ³		
		Previous	Current	YES	NO	Continuous	Intermittent	
CE01	Caterpillar Model G3612 TALE, 4 Cycle low-NO _x Internal Combustion Engine rated at 3506 HP @ 1000 rpm and 130° F aftercooler inlet temperature, Natural Gas Fired.							
CE02	Caterpillar Model G3612 TALE, 4 Cycle low-NO _x Internal Combustion Engine rated at 3506 HP @ 1000 rpm and 130° F aftercooler inlet temperature, Natural Gas Fired.							
CE03	Caterpillar Model G3612 TALE, 4 Cycle low-NO _x Internal Combustion Engine rated at 3506 HP @ 1000 rpm and 130° F aftercooler inlet temperature, Natural Gas Fired.							
CE04	Caterpillar Model G3612 TALE, 4 Cycle low-NO _x Internal Combustion Engine rated at 3506 HP @ 1000 rpm and 130° F aftercooler inlet temperature, Natural Gas Fired.							
CE05	Caterpillar Model 3612 TALE, 4 Cycle low-NO _X Internal Combustion Engine rated at 3550 HP @ 1000 rpm. Natural Gas Fired.							
CE06	Caterpillar Model 3616 TALE, 4 Cycle low-NO _X							

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Facility ID	Unit Description	Deviations Reported ¹		Monitoring Method per Permit? ²		Was compliance continuous or intermittent? ³		
		Previous	Current	YES	NO	Continuous	Intermittent	
	Internal Combustion Engine rated at 4735 HP @ 1000 rpm. Natural Gas Fired							
DU04	Exterran Triethylene Glycol Dehydrator Design Rated at 150 MMscf/day, Equipped with reboiler, flash tank and associated still vent							
TK01-TK04, TK08-TK09	Condensate storage tank battery: Four 300 bbl and two 500 bbl							
FG01	Fugitive emissions of VOCs from equipment leaks.							
LO01	Condensate truck loadout							
General Conditions								
Insignificant Activities ⁴								

¹ If deviations were noted in a previous deviation report, put an "X" under "previous". If deviations were noted in the current deviation report (i.e. for the last six months of the annual reporting period), put an "X" under "current". Mark both columns if both apply.

NOTE:

The Periodic Monitoring requirements of the Operating Permit program rule are intended to provide assurance that even in the absence of a continuous system of monitoring the Title V source can demonstrate whether it has operated in continuous compliance for the duration of the reporting period. Therefore, if a source 1) conducts all of the monitoring and recordkeeping required in its permit, even if such activities are done periodically and not continuously, and if 2) such monitoring and recordkeeping does not indicate non-compliance, and if 3) the Responsible Official is not aware of any credible evidence that indicates non-compliance, then the Responsible Official can certify that the emission point(s) in question were in continuous compliance during the applicable time period.

² Note whether the method(s) used to determine the compliance status with each term and condition was the method(s) specified in the permit. If it was not, mark "no" and attach additional information/explanation.

³ Note whether the compliance status with of each term and condition provided was continuous or intermittent. "Intermittent Compliance" can mean either that noncompliance has occurred or that the owner or operator has data sufficient to certify compliance only on an intermittent basis. Certification of intermittent compliance therefore does not necessarily mean that any noncompliance has occurred.

⁴Compliance status for these sources shall be based on a reasonable inquiry using readily available information.

II.	Status	for Acc	cidental Rele	ase Prevention	on Progr	ram:								
	A.		acility se Prevention									of the	Accide	ental
	B.	If subject requires	If subject: The facility is is not in compliance with all the requirements of section 112(r).							the				
III.	Certifi	1.		nagement Pl authority an										the
Colora	do Reg	ulation	ne Annual Co No. 3, Part A submitted.											
reason	able in		is certificat I certify tha ete.		-									
C.R.S.	, make	s any fa	Colorado S alse materia nay be punis	l statement,	represe	entation	, or ce	rtificat	tion i	n this	s docun	nent is ş		
		Printed	d or Typed N	lame							Tit	tle		
		S	lignature								Date	Signed		

NOTE: All compliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit.

APPENDIX D

Notification Addresses

1. Air Pollution Control Division

Colorado Department of Public Health and Environment Air Pollution Control Division Operating Permits Unit APCD-SS-B1 4300 Cherry Creek Drive S. Denver, CO 80246-1530

ATTN: Matt Burgett

2. United States Environmental Protection Agency

Compliance Notifications:

Office of Enforcement, Compliance and Environmental Justice Mail Code 8ENF-T U.S. Environmental Protection Agency, Region VIII 1595 Wynkoop Street Denver, CO 80202-1129

Permit Modifications, Off Permit Changes:

Office of Partnerships and Regulatory Assistance Air and Radiation Programs, 8P-AR U.S. Environmental Protection Agency, Region VIII 1595 Wynkoop Street Denver, CO 80202-1129

APPENDIX E

Permit Acronyms

Listed Alphabetically:

AIRS -	Aerometric Information Retrieval System
AP-42 -	EPA Document Compiling Air Pollutant Emission Factors
APEN -	Air Pollution Emission Notice (State of Colorado)
APCD -	Air Pollution Control Division (State of Colorado)
ASTM -	American Society for Testing and Materials
BACT -	Best Available Control Technology
BTU -	British Thermal Unit
CAA -	Clean Air Act (CAAA = Clean Air Act Amendments)

CCR - Colorado Code of Regulations CEM - Continuous Emissions Monitor

CF - Cubic Feet (SCF = Standard Cubic Feet)

CFR - Code of Federal Regulations

CO - Carbon Monoxide

COM - Continuous Opacity Monitor CRS - Colorado Revised Statute DRO - Diesel Range Organics

EF - Emission Factor

EPA - Environmental Protection Agency FI - Fuel Input Rate in MMBtu/hr

FR - Federal Register

G - Grams Gal - Gallon

GPM - Gallons per Minute
GRO - Gasoline Range Organics
HAPs - Hazardous Air Pollutants

HP - Horsepower

HP-HR - Horsepower Hour (G/HP-HR = Grams per Horsepower Hour)

LAER - Lowest Achievable Emission Rate

LBS - Pounds
M - Thousand
MM - Million

MMscf - Million Standard Cubic Feet

MMscfd - Million Standard Cubic Feet per Day

N/A or NA - Not Applicable NOx - Nitrogen Oxides

NESHAP - National Emission Standards for Hazardous Air Pollutants

NSPS - New Source Performance Standards P - Process Weight Rate in Tons/Hr

PE - Particulate Emissions

PM -	Particulate Matter
PM_{10} -	Particulate Matter Under 10 Microns
PSD -	Prevention of Significant Deterioration

PTE - Potential To Emit

RACT - Reasonably Available Control Technology

SCC - Source Classification Code

SCF - Standard Cubic Feet

SIC - Standard Industrial Classification

SO₂ - Sulfur Dioxide

TPH - Total Petroleum Hydrocarbons

TPY - Tons Per Year

TSP - Total Suspended Particulate VOC - Volatile Organic Compounds

APPENDIX F

Permit Modifications

DATE OF REVISION	SECTION NUMBER, CONDITION NUMBER	DESCRIPTION OF REVISION
March 21, 2012	Throughout	Split compressor station from the Hunter Mesa Water Treatment Facility (045/0867), previously permitted under 03OPGA267 Transfer of ownership to Grand River Gathering, LLC

APPENDIX G

Applicability Reports (ver 10/1/11)

Note: A MS Word version of this Appendix can be found at:

http://www.cdphe.state.co.us/ap/oilgaspermitting.html

DISCLAIMER:

These are only example reports and do not cover all possible requirements.

Engine AOS Applicability Report Certification Language

All information for the Applicability Reports must be certified by either 1) for Operating Permits, a Responsible Official as defined in Colorado Regulation No. 3, Part A, Section I.B.38. or 2) for Construction and General Permits, the person legally authorized to act on behalf of the source. This signed certification document must be packaged with the documents being submitted.

I have reviewed this certification in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this certification are true, accurate and complete. Further, I agree that by signing and submitting these documents I agree that any new requirements identified in the Applicability Report(s) shall be considered to be Applicable Requirements as defined in Colorado Regulation No. 3, section I.B.9., and that such requirements shall be enforceable by the Division and its agents and shall be considered to be revisions to the underlying permit(s) referenced in the Report(s) until such time as the Permit is revised to reflect the new requirements.

Please note that the Colorado Statutes state that any person who knowingly, as defined in § 18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this document is guilty of a misdemeanor and may be punished in accordance with the provisions of § 25-7 122.1, C.R.S.

Printed or Typed Name	
Title	
Signature	Date Signed

Colorado Regulation No. 7 Sections XVI and XVII.E

DISCLAIMER: This is only an example report and does not cover all possible Reg 7 requirements.

Company: Acme Gas Processing

Source ID: 999/1234/001 Permit #: 930PXX999 Date: October 1, 2008

Determination of compliance and reporting requirements for a

Manufacturer: BestEngineCompany

Model: 777 LowNox

Nameplate HP: 1340

Construction date: July 1, 2007

Note: If the engine is exempt from a requirement due to construction date or was relocated from within Colorado, supporting documentation must be provided.

Determination of Regulation No. 7 requirements:

Regulation No. 7, § XVI

	to this engine. Engine is not located in the ozone nonattainment area or does not have an rate greater than 500 horsepower or did not commence operation on or after June 1, 2004.
Does apply to thi	s engine and applicable emissions controls have been installed.
Regulation No. 7, §	XVII.E
	to this engine. Engine does not have a maximum horsepower greater than 100 or the ation date precedes the applicability dates.
Does apply to thi	s engine. The following emission limits apply to the engine:
NO _X (g/hp-hr):	2.0
CO (g/hp-hr):	4.0
VOC (g/hp-hr):	1.0

Max Engine HP	Construction or Relocation Date	Emission Standards in g/hp-hr			
		NO_X	CO	VOC	
100 <hp<500< td=""><td>January 1, 2008</td><td>2.0</td><td>4.0</td><td>1.0</td></hp<500<>	January 1, 2008	2.0	4.0	1.0	
	January 1, 2011	1.0	2.0	0.7	
500 <u><</u> Hp	July 1, 2007	2.0	4.0	1.0	
	July 1, 2010	1.0	2.0	0.7	

NSPS JJJJ Example Report Format

DISCLAIMER: This is only an example report and does not cover all possible JJJJ requirements. Note that as of September 1, 2008 that the Division has not yet adopted NSPS JJJJ. Until such time as it does, any engine subject to NSPS will be subject only under Federal law. Once the Division adopts NSPS JJJJ, there will be an additional step added to the determination of the NSPS. Under the provisions of Regulation No. 6, Part B, § I.B (which is referenced in Part A), any engine relocated from outside of the State of Colorado into the State of Colorado is considered to be a new source, subject to the requirements of NSPS JJJJ.

NSPS Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion **Engines**

Acme Gas Processing Company:

Source ID: 999/1234/001 Permit #: 93OPXX999 Date: October 1, 2008

Manufacturer: **BestEngineCompany**

777 LowNox Model:

1340 Nameplate HP:

Engine Type: 2 Stroke Rich Burn

Manufacture Date: July 1, 2007 Date Engine Ordered: April 1, 2007

Note: If the engine is exempt from a requirement due to construction/manufacture date, supporting documentation must be provided.

Upon adoption of NSPS Subpart IIII into Colorado Pagulation No. 6, Part A, if the angine is exampt because

the engine was relocated within the state of Colorado, supporting documentation must be provided.
NSPS JJJJ does not apply to this engine.
NSPS JJJJ does apply to this engine.
Note: Using the format below, the source must submit to the Division an analysis of all of the NSPS JJ

IJ applicable requirements that apply to this specific engine. The analysis below is an example only, based on a hypothetical engine that is a rich burn engine, greater than 500 HP, with a manufacture date after July 1, 2007.

<u>Determination of NSPS JJJJ requirements:</u>

60.4230 Applicability

(a)(4)(i) Applies to this engine since it is a rich burn engine, greater than 500 HP, with a manufacture date after July 1, 2007.

60.4233 Emission Standards for Owners and Operators

(e) Owners and operators of stationary SI ICE with a maximum engine power greater than 100 HP must comply with the standards in Table 1.

Non-Emergency SI, Natural Gas, HP≥500, Manufactured after 7/1/2007

NO_x 2.0 g/HP-hr or 160 ppmvd@15% O₂ CO 4.0 g/HP-hr or 540 ppmvd@15% O₂ VOC 1.0 g/HP-hr or 86 ppmvd@15% O₂

Other Requirements for Owners and Operators

60.4234	Emission standards must be met for the lifetime of the engine.
60.4235	N/A - Sulfur content of gasoline.
60.4236	N/A (for now) - After July 1, 2009 owners and operators may not install engines with a
	power rating \geq 500HP that do not meet the emissions standards in 60.4230.

60.4237 N/A - Emergency Engines.

60.4238 - 60.4242 Compliance Requirements for Manufacturers – (Not Applicable)

60.4243 Compliance Requirements for Owners and Operators

- (b)(2)(ii) To maintain compliance with the emission limits in 60.4233, owners of SI ICE ≥ 500 HP must:
 - Keep a maintenance plan;
 - Keep records of conducted maintenance;
 - Maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions;
 - Conduct an initial performance test; and
 - Conduct subsequent performance tests every 8,760 hours or every three years, which ever comes first, in order to demonstrate compliance with the emission limits.

(g) Air to fuel ratio controllers (AFRCs) must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.

60.4244 Testing Requirements for Owners and Operators

- (a) Each performance test must be conducted within 10% of the highest achievable load and must comply with the testing requirements listed in 60.8 and Table 2 of NSPS JJJJ.
- (b) Performance tests may not be conducted during periods of startup, shutdown, or malfunction, as specified in 60.8(c). If the engine is non-operational when a performance test is due, the engine does not need to be started up just to test it, but will need to be tested immediately upon startup.
- (c) Three separate test runs must be conducted for each performance test as specified by 60.8(f). Each run must be within 10% of max load and be at least 1 hour in duration.
- (d) To determine compliance with the NO_x, CO, and VOC mass per unit output emission limitations, the measured concentration must be converted using the equations outlined in this section of NSPS JJJJ.

60.4245 Notification, Reports, and Records for Owners and Operators

- (a) Owners of all stationary SI ICE must keep records of the following:
 - (1) All notifications submitted to comply with this subpart;
 - (2) Maintenance conducted on the engine;
 - (3) N/A Manufacturer information for certified engines, and
 - (4) Documentation that shows non-certified engines are in compliance with the emission standards.
- (b) N/A For emergency engines only.
- Owners of non-certified engines \geq 500HP must submit an initial notification as required in 60.7(a)(1) which includes the following information:
 - (1) Name and address of the owner or operator;
 - (2) The address of the affected source;
 - (3) Engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement;
 - (4) Emission control equipment; and
 - (5) Fuel used.

CONCLUSION OF FINDINGS (EXAMPLE ONLY)

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In general, Acme's 1,235HP, Waukesha 7042 GSI engine is subject to the emissions limitations summarized in Table 1 of NSPS JJJJ. ACME will meet these emission limitations using an AFRC and a non-selective catalytic converter (NSCR). These emission rates will be met throughout the life of the engine. A maintenance plan will be kept and all maintenance activities will be recorded. Compliance with the emission limits will be confirmed by the initial performance tests, which shall be conducted following the procedures outlined in 60.4244. Copies of performance test results will be submitted within 60 days of the completion of each test. Since this is an uncertified engine, an initial notification will be submitted including all of the requested information in 40.4245 within 30 days of startup. ACME will keep records of all compliance related materials.

MACT ZZZZ Example Report Format

DISCLAIMER: This is only an example report and does not cover all possible ZZZZ requirements.

MACT Subpart ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Company: Acme Gas Processing

Source ID: 999/1234/001 Permit #: 93OPXX999 Date: October 1, 2008

Manufacturer: BestEngineCompany

Model: 777 LowNox

Nameplate HP: 1340

Engine Type: 2 Stroke Rich Burn

Manufacture Date: July 1, 2007 Date Engine Ordered: April 1, 2007

Note: If the engine is exempt from a requirement due to construction/reconstruction date, supporting documentation must be provided.

」MACT ZZZZ	Z does not	apply to	this	engine
MACT ZZZZ	Z does app	olv to this	eng	ine.

Note: Using the format below, the source must submit to the Division an analysis of all of the major source MACT ZZZZ applicable requirements that apply to this specific engine. **The analysis below is an example only**, based on a hypothetical new engine located at a major source of HAP emissions.

Determination of MACT ZZZZ requirements:

63.6585 Applicability

This subpart is applicable to Acme's engine since they are going to be operating a new stationary reciprocating internal combustion engine (RICE) at a major source of HAP emissions.

63.6590 What Parts of My Plant Does This Subpart Cover?

This subpart covers Acme's new stationary reciprocating internal combustion engine.

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63.6595 When do I have to comply with this Subpart?

(a)(5) The engine must comply with the applicable emission limitations and operating limitations upon startup.

63.6600 Emission and operating limitations for RICE site rated at more than 500 hp

(a) The engine is subject to the emission limits in table 1a and the operating limits in table 1b. ACME will meet the emission limitations by reducing formaldehyde emissions by 76 percent and will maintain the catalyst such that the pressure drop does not change by more than 2 inches of H_2O at 100 % load plus or minus 10 percent from the pressure drop measured during the initial performance test and will maintain the temperature of the engine exhaust so that the catalyst inlet temperature is greater than or equal to 750 ° F and less than or equal to 1250 ° F.

The engine will be equipped with non-selective catalytic reduction and an air fuel controller to meet the emission limitations.

63.6601 & 63.6611 Requirements for 4SLB engines between 250 and 200 hp

These requirements do not apply.

63.6605 General Requirements

- (a) The engine will comply with the emission and operating limitations at all times, except during periods of startup, shutdown and malfunction (SSM)
- (b) The engine, including air pollution control and monitoring equipment shall be operating in a manner consistent with good air pollution control practices for minimizing emissions at all times, including during SSM.

63.6610 Initial performance test

- (a) the performance tests specified in Table 4 (select sampling port and measure O₂, moisture and formaldehyde at inlet and outlet of the control device) shall be conducted within 180 days of startup.
- (b) & (c) not applicable construction did not commence between 12/19/02 and 6/15/04.
- (d) previous performance tests have not been conducted on this unit within two years, therefore, this provision does not apply.

63.6615 Subsequent performance tests

Subsequent tests will be conducted as specified in Table 3. No additional testing is required for 4SRB engines meeting the formaldehyde percent reduction requirements.

63.6620 Performance test procedures

- (b) tests must be conducted at 100 % load plus or minus 10%
- (c) tests may not be conducted during periods of SSM.
- (d) must conduct three 1-hr test runs
- (e) equation (e)(1) shall be used to determine compliance with the percent reduction requirement.
- (f), (g) & (h) Not applicable

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(i) engine load during test shall be determined as specified in this paragraph.

63.6625 Monitoring, installation, operation and maintenance requirements

- (a), (c) & (d) Not applicable
- (b) a continuous parameter monitoring system (CPMS) shall be installed to measure the catalyst inlet temperature. The CPMS will meet the requirements in § 63.8

63.6630 Demonstrating initial compliance

- (a) initial compliance shall be determined in accordance with table 5 (initial performance test must indicate formaldehyde reduction of 76 percent or more, a CPMS must be installed to measure inlet temperature of the catalyst and the pressure drop and catalyst inlet temperature must be recorded during the initial performance test).
- (b) pressure differential will be established during the initial performance test.
- (c) Notification of compliance status will be submitted and will contain the results of the initial compliance demonstration.

63.6635 Monitoring to demonstrate continuous compliance

- (b) except for monitor malfunctions, associated repairs, and required QA/QC activities monitoring must be continuous at all time the engine is operating.
- (c) data recorded during monitoring malfunctions, associated repairs and required QA/QC activities must not be used in data averages and calculations to report operating levels, however, all the valid data collected during other periods shall be used.

63.6640 Demonstrating continuous compliance

- (a) continuous compliance will be demonstrated as specified in table 6 (collect catalyst inlet temperature data, reduce that data to 4-hr rolling average and maintain the 4-hr rolling averages to within the operating limitation and measuring the pressure drop across the catalyst once per month and demonstrating that the pressure drop meets the operating limitation.
- (b) deviations from the emission and operating limitations must be reported per § 63.6550. If catalyst is changed the operating parameters established during the initial performance test must be re-established.

When operating parameters re-established a performance test must also be conducted.

63.6645 Notifications

- (a) Submit notifications in §§ 63.7(b) & (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) thru (e) & (g) & (h) that apply by dates specified.
- (b) Not applicable. Acme unit started after effective dated for Subpart ZZZZ.
- (c) Submit initial notification within 120 days after becoming subject to Subpart ZZZZ.
- (d) thru (f) Not applicable. Acme engine greater than 500 hp and subject to requirements in Subpart ZZZZ.
- (g) & (h) Submit notification of intent to conduct performance test and notification of compliance status.

63.6650 Reports

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- (a) Submit reports required by table 7 (compliance report and SSM reports (if actions inconsistent with SSM plan)
- (b) Not applicable, an alternate schedule for report submittal has been approved. Reports will be submitted with title v reports
- (c) Compliance reports to contain the following information: company name and address, statement by responsible official certifying accuracy, date of report and beginning and end of reporting period, if SSM the information in 63.10(d)(5)(i), if no deviations a statement saying that, if no periods when CPMS out of control a statement saying that.
- (d) Not applicable, using CPMS
- (e) For each deviation the information in (e)(1) thru (e)(12) shall be provided.
- (f) Applicable. Compliance reports are submitted with title v reports. Compliance reports under Subpart ZZZZ include all necessary info for title v deviation report with respect to Subpart ZZZZ requirements.
- (g) Not applicable. Acme engine not firing landfill or digester gas.

63.6655 Recordkeeping

- (a) Retain records as follows: copy of each notification and report (including all documentation supporting any initial notification or notification of compliance status), records in 63.6(e)(iii) thru (v) related to SSM, and records of performance tests and evaluations.
- (b) CPMS records including records in 63.10(b)(2)(vi) thru (xi), previous versions of the performance evaluation plan required by 63.8(d)(3) and requests for alternatives to the relative accuracy test for CPMS as required by 63.8(f)(6)(i).
- (c) Not applicable. Acme engine not firing landfill or digester gas.
- (d) Will keep records required in Table 6 (monthly pressure drop readings, 4-hr averages of catalyst inlet temperature) to show continuous compliance with emission and operating limits.

63.6660 Form and length of records

- (a) records must be in a form suitable and readily available for expeditions review
- (b) records must be retained for five years
- (c) records must be retained on-site for first 2 years, may be retained off-site for the remaining 3 years

63.6665 General Provisions

This engine must comply with the general provisions as indicated in Table 8.

CONCLUSION OF FINDINGS (EXAMPLE ONLY)

Since this engine is subject to the requirements of MACT Subpart ZZZZ. The engine will be installed with a non-selective catalyst to meet the formaldehyde reduction requirement of 76% or more. An initial performance test will be conducted within 180 days of startup to demonstrate compliance with the formaldehyde percent

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reduction requirement. During the initial performance test, the pressure drop across the catalyst will be measured. A CPMS will be installed to measure the catalyst inlet temperature. Continuous compliance will be demonstrated by keeping the 4-hr rolling averages of catalyst inlet temperature within the operating limitations and recording the pressure drop across the catalyst monthly and demonstrating that the pressure drop is within the operating limitation.

Records, notifications and reports will be submitted as required. To that end required reports and notifications include initial notification, notice of intent to conduct performance test, notification of compliance status, SSM reports (if required) and semi-annual compliance reports.